

February 15, 2018

Washington State Department of Ecology:  
Adam Sant, Southwest Washington Grant Manager

Dear Floodplains by Design Project Review Team,

The Snohomish-Stillaguamish Local Integrating Organization (LIO) is pleased to provide this letter in support of the *Sustainable Lands Strategy: Implementing Skykomish River Subreach Solutions* pre-application for the 2019-2021 Floodplains by Design program. The project supports the "integrated floodplain management" approach of the FbD grant program. The LIO supports this proposal as it aligns with recommended Puget Sound Partnership near term actions (NTA) and will assist in better defining and implementing projects on the Snohomish River Basin Salmon Recovery Plan 4-year work plan.

Proposed tasks will also implement actions recommended by science-based, locally-derived strategies for improving water quality and reducing flood damages which will benefit floodplain residents and the economy of this active agricultural landscape.

Solutions are developed to increase collaboration among agencies and organizations working to preserve agricultural viability while improving ecological functions and reducing flood losses. Actions are consistent with Snohomish-Stillaguamish LIO 5-Year Ecosystem Recovery Plan elements, such as:

- Achieving a decrease in the number of impaired (303(d) listed) waters through actions such as implementation of agricultural BMPs (SSLIO 02.1 Integrated Planning),
- Reducing loss of forested land and vegetation cover through preservation and replanting actions (SSLIO 10.1 & 10.2 Freshwater and Estuarine Protection and Restoration), and
- Halting additional loss of floodplain function through habitat restoration and conservation actions (SSLIO 10.1 & 10.2 Freshwater and Estuarine Protection and Restoration).

Completion of these subreach solutions will advance several of the LIO's proposed 2018 NTAs (2018-0399, 2018-0097, 2018-0623, 2018-0872, 2018-0873, and 2018-0715) and contribute to the ten-year riparian restoration goals identified in the Snohomish River Basin Salmon Recovery Plan.

The LIO endorses this project that will benefit multiple stakeholders and implement key local actions to help achieve targets identified in the Puget Sound Action Agenda.

Thank you for considering this project for funding.

Sincerely,

Snohomish-Stillaguamish LIO Executive Committee



Will Hall  
Co-Chair, Snohomish-Stillaguamish LIO  
Executive Committee



Christie True  
Co-Chair, Snohomish-Stillaguamish LIO  
Executive Committee



July 30, 2018

Washington State Departments of Ecology  
c/o Adam Sant, Floodplain Project Manager

Dear Floodplains by Design Project Review Team,

The Snohomish-Stillaguamish Local Integrating Organization (LIO) is pleased to provide this letter in support of the *South Fork Snoqualmie River Levee Setback Project* application for the 2019-2021 Floodplains by Design program. The LIO supports this proposal as it aligns with recommended Puget Sound Partnership near term actions (NTA) and is also on the Snohomish River Basin Salmon Recovery Plan 4-year work plan.

Proposed tasks will implement actions recommended by science-based, locally-derived strategies for improving water quality and reducing flood damages which will benefit floodplain residents and the economy of this active agricultural landscape.

Floodplains were selected as a High Priority Ecosystem Component in the Snohomish-Stillaguamish LIO 5-Year Ecosystem Recovery Plan. The LIO Plan acknowledges that reconnection of floodplain habitat is a key strategy for recovery as identified in both basins' salmon recovery plans. This project's actions are consistent with LIO Strategy 10.1 & 10.2 Freshwater and Estuarine Protection and Restoration.

The LIO endorses this project that will benefit multiple stakeholders and implement key local actions to help achieve targets identified in the Puget Sound Action Agenda.

Thank you for considering this project for funding.

Sincerely,

Snohomish-Stillaguamish LIO Executive Committee

A handwritten signature in blue ink, appearing to read "Gregg Farris", written in a cursive style.

Gregg Farris  
Co-Chair, Snohomish-Stillaguamish LIO  
Executive Committee

A handwritten signature in blue ink, appearing to read "Christie True", written in a cursive style.

Christie True  
Co-Chair, Snohomish-Stillaguamish LIO  
Executive Committee



October 9, 2018

Washington State Department of Ecology  
c/o Daniel Thompson, Water Quality Combined Funding Cycle Coordinator

Dear Water Quality Combined Funding Cycle Project Review Team,

The Snohomish-Stillaguamish Local Integrating Organization (LIO) is pleased to provide this letter in support of Washington State University Extension's *Latino Stormwater Pollution Awareness and Behavior Change Campaign - Phase 2* application for the State Fiscal Year (SFY) 2020 funding cycle of the program.

The LIO vision is to accelerate Snohomish and Stillaguamish ecosystem recovery. This project aligns with the LIO's goals and strategies of the plan, particularly strategy 04.1, *Outreach for Stormwater Stewardship*. Phase 1 of this project was adopted into the 2016 Puget Sound Action Agenda and was selected for direct funding from our local LIO. Phase 2 implementation will expand the scale of impact of this important project. The LIO endorses the next phase of this project that will benefit multiple stakeholders and implement a key local project to help achieve targets identified in the Puget Sound Action Agenda and our Snohomish-Stillaguamish LIO 5-Year Ecosystem Recovery Plan.

Thank you for considering this project for funding.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessica Hamill", is written over a light blue horizontal line.

Jessica Hamill  
Coordinator, Snohomish-Stillaguamish LIO

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 Snohomish-Stillaguamish Local Integrating Organization (LIO), we thank you for the opportunity to comment on the draft 2018-2022 Action Agenda. The LIO is comprised of 24 stakeholder representatives from local governments, Tribes, non-governmental organizations, salmon recovery Lead Entity representatives, State Agencies, and concerned citizens. The goals of the LIO are to 1) ensure funding is targeting at the highest priority strategies and actions and 2) coordinate recovery actions across local areas and the region. We have been working toward those goals since the LIO was formed.

The LIO has been involved in the process to identify and develop Puget Sound regional recovery priorities and developed an Ecosystem Recovery Plan with ten strategies, ten high priority Vital Signs (the same Vital Signs that formed the regional priorities) and bundles of actions that support Puget Sound recovery. LIO representatives participate as members of the Puget Sound Salmon Recovery Council, Tribal Management Conference, Snohomish Salmon Recovery Forum (WRIA 7), the Stillaguamish Watershed Council (WRIA 5), the Snoqualmie Watershed Forum (WRIA 7), and our LIO Coordinator represents local priorities at the Action Agenda Coordination Group. It is from this locally integrated perspective that we offer the following comments.

#### **Recovery Framework Improvements**

The draft Action Agenda responded to and incorporated much of the feedback provided in previous iterations of the Action Agenda and is an improvement over previous versions. Firstly, the separation of the Comprehensive Plan and the Implementation Plan provided more clarity between the multiple objectives of the Action Agenda, to both describe how we will collectively implement recovery actions as well as how the relationships between recovery partners provide the foundation for the development of implementation strategies and actions. Secondly, the description of the problems Puget Sound is facing demonstrated the magnitude of the problem and provided a call to action which was responsive to feedback from multiple partners. Finally, the description of the relationship between salmon recovery and Puget Sound recovery more broadly is also improved and strengthened by the emphasis on the Puget Sound Salmon Recovery Plan as well as the individual LIO Ecosystem Recovery Plans as part of the foundational documents for setting regional recovery priorities. We would echo the suggestions provided by our WRIA 8 partners to further strengthen the discussion of integrating salmon recovery and Puget Sound recovery by 1) including a reference to the statute that established Lead Entities and 2) clarification of how the Lead Entity four-year work plans are supported by the Action Agenda.

### **Vital Sign Indicators and Targets**

There is a need to review/modify some existing targets and indicators to more appropriately capture the progress that can be achieved in a given timeframe. It also may be necessary to establish interim targets that can more realistically be accomplished in a shorter period of time and can inform decision-making around adaptive management actions. As our partners in WRIA 8 pointed out, 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.

### **Ongoing Programs and Funding**

The robust list of ongoing programs is impressive but it doesn't convey their importance to Puget Sound recovery. Better cross-reference between ongoing programs and NTAs would demonstrate their importance within the recovery framework as well as how NTAs help build upon/expand/enhance those programs. We suggest that the list of ongoing programs also include the local level funding to better communicate the overall contribution to recovery of ongoing programs and the opportunity cost of not fully funding them. It would also be useful to articulate some of the threats to ongoing programs and where the Partnership can provide support for maintaining or securing increases in funding.

Utility fees fund habitat restoration projects, protection actions, monitoring programs, and capacity to convene salmon and ecosystem recovery stakeholders to adaptively manage recovery actions. If these funds are not consistently increased with the pace of inflation, the ability of local jurisdictions to implement recovery actions is impeded and progress can be stalled. The section on "Fulfilling the Funding Need" and subsection "maintain existing funding" could be strengthened by including examples of locally based programs (i.e. local jurisdiction utility rate increases and TDR programs) and funding levels as additional programs the Partnership is asked to "defend."

The Action Agenda correctly points out that lack of sufficient funding is the biggest barrier to accelerating Puget Sound recovery. Prioritizing the regional funding strategy is important. While exploration of philanthropic sources of funding is a good step toward increasing the overall amount of recovery funding, exploration of other potential funding mechanisms and corporate sources (i.e. Microsoft or Amazon) of funding would also be an important element of a funding strategy. For example, establishment of a regional (or statewide) in-lieu-fee (ILF) compensatory mitigation program could provide a home for mitigation funds that can support high priority recovery projects. Development of our transportation infrastructure has unavoidable impacts. Impacts can be mitigated much more strategically by directing those funds toward top priority restoration actions, vetted through the ILF certification process. There is much debate about the implications of using mitigation funds for recovery. However, exploration of how to more strategically utilize mitigation funds for recovery would demonstrate how the region is making "the most of available funding."<sup>1</sup> We also reinforce the comments provided by our WRIA 8 partners related to the regional funding strategy.

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<sup>1</sup> King County's current ILF program may be informative toward that end.





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 ecosystem recovery in the LIO, please contact Jessica Hamill, LIO Coordinator, at [jessica.hamill@snoco.org](mailto:jessica.hamill@snoco.org) or 425-388-6476.

Sincerely,

Snohomish-Stillaguamish LIO Executive Committee

A handwritten signature in blue ink that reads 'Gregg Farris'.

Gregg Farris  
Co-Chair, Snohomish-Stillaguamish LIO  
Executive Committee

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Co-Chair, Snohomish-Stillaguamish LIO  
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