

# **Shared Strategy for Puget Sound Comments on April 2007 Three-Year Work Program Update Puyallup/White and Chambers/Clover Creek Watershed**

## Introduction

In April 2007, watersheds submitted three-year work program updates on accomplishments and proposed actions that built on the 2006 three-year work program they developed to get on a recovery trajectory in the first three years of implementation.

This feedback is intended to assist the watershed recovery plan implementation team as it continues to address actions and implementation of their salmon recovery plan. The feedback is also being used by the TRT and Recovery Council Work Group to inform the continued development and implementation of the regional work program components such as adaptive management. The feedback will also stimulate further discussion on recovery objectives to determine what the best investments are for salmon recovery over the next three years.

## Guidance for the 2007 work program updates

Guidance for the preparation of the 3-Year Work Program update emphasized the importance of stating what has changed in the Update of the 3-Year Work Program from the prior adopted Work Program. Watersheds were asked to:

- Describe why you have made the changes proposed, including rationale for including, omitting, or changing the rank of a project;
- Describe any adjustments related to considering sequencing, timing, or H-Integration issues; and
- Discuss the status of implementation of your three year work program – what have you accomplished in terms of the priority actions, what have you struggled with and how you have resolved it, and provide suggestions, if the issues were not resolved, on how we might work together to improve the situation in the future.

The guidance for preparation of the work program update provided the following as factors to be considered by the Puget Sound Technical Recovery Team in performing its technical review of the Update.

- a. Is the Update consistent with the hypotheses and strategy for the watershed's work program?
- b. Is the sequencing and timing of the actions in your updated 3-Year Work Program appropriate for this first full year of implementation of the Puget Sound Salmon Recovery Plan?
- c. Are there significant components missing from the work program? If so, what are these and what can be done about them in the 3-year work program update or at a regional scale?

Watersheds were provided with the following 7 questions that the Recovery Council Work Group would address in performing its policy review of the Three-Year Work Program.

1. Is the work program consistent with the policy feedback and recommendations from the 2004 documents, Puget Sound Salmon Recovery Plan (See Volume I, Watershed Profiles – Results section), and the NMFS supplement to the Puget Sound Salmon Recovery Plan, as well as the regional nearshore chapter guidance, where applicable?
2. Is the work program tied to the identified three-year objectives and scheduled to proceed at a pace sufficient to achieve the watershed's ten-year goals?
3. Is the work program narrative tightly linked to individual projects and priorities?
4. To what extent do programmatic actions address protection identified in the work program and non-capital project list?
5. To what extent are habitat, harvest and habitat actions integrated and included in the work program?
6. To what extent does the work program address the watershed's capacity to implement the updated three-year work program?

Guidance noted that the Work Group would also examine the objectives of the Three-Year Work Program and how well the program addresses them. This includes considering whether the Work Program Update:

- Improves the level and certainty of protection for habitat and the 22 existing Chinook populations;
- Preserves options for achieving the future role of this population in the ESU;
- Ensures that protection and restoration preserve and restore ecosystem processes for Chinook; and
- Advances the coordinated/integrated management of harvest, hatchery and habitat.

## **I. Puget Sound Technical Recovery Team Review**

The TRT reviewed updates to fourteen individual watershed salmon recovery three-year work programs in May 2007. Three questions were addressed. The questions and TRT's review comments on the Puyallup Watershed three-year work program are below.

*1. Is the work plan consistent with the hypotheses and strategy for their watershed? (The "work program" includes hypotheses and strategies in the larger plan, including the watershed plan, TRT review comments and Federal Supplement comments).*

No, the work program overall does not appear consistent with the strategy, the TRT comments, and Federal Supplement comments. While the watershed group has been diligent in continuing to collaborate and make substantial progress on a number of items identified during initial work plan review, imminent threats that could well preclude ESU recovery remain inadequately addressed to abate the threats. This is not a criticism of the good work of the watershed group or the watershed plan itself, but a re-statement of the warning in the

Regional Recovery Plan that immediate special actions by state and federal agencies, in concert with the watershed, appear to be necessary to secure the potential for reaching essential goals. Based upon our review, there are high remaining uncertainties that the following items can be accomplished in a timely manner to secure the future opportunity to recover the White River Chinook population to a “low risk of extinction”:

- **Acquire riverine and estuarine floodplain corridors to secure future opportunity to achieve recovery in the face of the rapid development in the watershed.**
- **Actions to secure favorable flows in the lower White River**
- **Develop and implement a White River population protection strategy in the White River.**
- **Identify and adopt a prioritized Puyallup estuary ecosystem restoration action plan consistent with the existing estuarine ecosystem-scale restoration guidance and assessments.**

The uncertainty that the above key early actions can be accomplished continues to pose threats to the ultimate success of the entire regional recovery effort and, therefore, warrants immediate attention commensurate with their regional significance.

Beyond the issues already noted, there are a number of additional challenges that still need attention and resolution to reconcile the 3-year work plan with the hypotheses and strategy for the watershed. It remains unclear whether some actions are fully consistent with the overall recovery plan with the information that has been provided to date. For example, the TRT technical review noted that further elaboration and documentation on how the harvest management objective for Puyallup Chinook NORs will allow natural adaptation to occur would reduce the remaining uncertainties regarding the harvest strategy. While the technical group has provided additional information, further justification for the assertion that natural adaptation is likely to occur under these circumstances is needed to reduce uncertainties. In another related example, the treatment of estuary protection and restoration in the work plan does not appear to follow from and be consistent with the estuarine analyses that served as the basis for formulation of the reported watershed assessment results. Again, further elaboration and justification for the assertion that the estuarine and nearshore work plan and projects are consistent with the watershed assessment findings and the recovery strategy would significantly reduce the remaining uncertainties.

The comments below recap and update some of the issues from the first review. Please also refer back to the first review.

At the other end of the cosmic scale, it would be much easier to review a narrative summary of changes to the project list and particularly the watershed’s rationale for why projects come and go and what progress has been made (i.e. which projects are done or not needed vs. not feasible or replaced by better alternatives). This is a generic comment for all watersheds, as better communicating easily assessable status update information freely among all interested parties will help facilitate implementation.

*2. Is the sequencing and timing of their work plan appropriate for the first 3 years of implementation?*

No. As noted in #1 above, the work plan does not identify the priority actions needed to secure future opportunity to achieve recovery in the face of the rapid development in the watershed. For both populations, further elaboration and documentation could be done to distinguish items which need immediate action to prevent irreversible harm, in the form of constraints on recovery potentials, from other priority limiting factors that could be addressed after opportunities for recovery are secured. For example, screening of the Electron hydroelectric project remains a top priority project that would substantially improve the productivity of the Puyallup population. However, it has not been identified as an imminent threat to the Puyallup population. Further elaboration and documentation regarding the potential for loss of opportunity for recovery would help reduce this key remaining uncertainty.

It is also important to note here that other than the above issue, we understand that sequencing has been and continues to be addressed through their watershed assessment and planning process. However, it remains a documentation issue for better regional to local group communication. It would be useful for the group to document how they have and are addressing sequencing to strengthen the demonstration of the links between their work plan and the hypotheses and strategy for their watershed.

*3. Are there significant components missing from the work plan? If so, what are these and what can be done about them in the 3-year work plan?*

### **Overall Strategy**

The TRT identified two major technical gaps in the overall strategy for the Puyallup-White watershed recovery plan and noted them as key issues in the overall approach because, if addressed, they will dramatically improve the certainty of an effective overall recovery strategy in the near-term plan:

Adoption of population recovery targets The Puyallup Tribe, WDFW and Pierce Co. have jointly begun the H-Integration process and are using the AHA Model. Using the model, they have identified and agreed to some near-term goals and actions. Long-term goals have not yet been identified.

H-Integration There is a continuing need for H-Integration to fill the significant gap previously identified. Acknowledging this ongoing effort as a priority action that is underway would help other interested parties understand the full suite of actions in play for the first three year period.

The third missing component that affects all Hs, as noted in the initial review:

Indigenous stock protection strategy An indigenous stock protection strategy addressing management uncertainties for Chinook returning to the White River remains as a key gap.

The stock management question for late returning fish in the White River is a focal point for this issue. Timely acquisition of better information on genetic relationships among Chinook in the basin, as well as on identification of the origin of returning adults, would significantly increase the understanding of population structure of the fish returning to the White River and their relationship to the fish in the remainder of the Puyallup watershed. Application of the data to better inform appropriate stock management alternatives and operational procedures at the Buckley trap and the hatchery facilities would substantially increase the probability of the success for recovering the White River Chinook population to a “low risk” status. Please also refer back to earlier recovery plan and work plan review comments for additional information. Again, acknowledging this identified gap and discussing the co-managers intentions for addressing it within the 3 year work plan is important for helping other interested parties understand the status of recovery in this watershed.

The work plan narrative demonstrates that the involved parties’ technical workgroups are continuing to make significant progress in focusing actions on improving viability of the populations. The technical workgroups have provided some additional documentation and empirical support for the harvest and hatchery strategies and actions and additional analytical support could further substantially reduce uncertainties. If the parties’ intend to continue these programmatic technical support efforts, it would be worth sharing this information with others in the region as expected accomplishments. A technical work plan to reduce analytical uncertainties for each of the Hs, as identified in the first TRT review, would still be a useful work product for distribution as part of the work plan.

### **Habitat strategy**

White River flows Actions to secure favorable flows in the lower White River, one of the key threats to the White population, are not included in the work plan. In spite of the identification of this action as a priority for recovery, the work plan does not propose or recommend any actions to resolve uncertainties for recovery associated with current ongoing proposals for consumptive use and removal of water from the White River. The use agreement that is proposed to divert flow from the White River at the Buckley Diversion Dam will have impacts on flows in the lower White and Puyallup Rivers that are expected to adversely impact both the White and Puyallup Chinook populations. The effects of this proposed use and withdrawal have not been evaluated yet. Changes in flow management at Mud Mountain Dam and at the PSE diversion to simulate a more natural flow regime have been identified as actions that would be highly effective in restoring productivity, abundance, and life history diversity. Timely resolution of flow management issues in a manner favorable to recovery needs, as defined by the recovery plan, would dramatically improve the certainty of an effective habitat strategy.

Estuary restoration. Opportunities to implement large scale restoration actions are limited and are disappearing rapidly. This is recognized as a key gap in the ability to achieve recovery of the populations. The TRT review suggested targeting the plan’s management actions for each of the Hs at a specific recovery outcome. The review notes, “the certainty that a strategy will result in the desired outcome is expected to increase as the plan’s linkages between working hypotheses, strategies, resulting sets of actions, and predicted population

responses are strengthened (see TRT Watershed Guidance document).” There are no explicit actions provided in the work plan to identify and adopt an estuary restoration action plan linked to existing assessments of the priorities for securing opportunities to restore a functional estuarine corridor consistent with recovery of the populations. For example, a study of alternatives for cross delta reconnectors (e.g. Hylebos distributary channel corridor effectiveness and acquisition would help advance understanding on this be added as a priority action for the 3 year work plan.

River floodplain restoration. As with the estuary, the opportunity to implement large scale restoration actions to restore the river floodplain corridor consistent with recovery of the two populations, is recognized as a key gap. Recognizing the substantial progress made in the form of the levee setback studies would help other interested parties understand the full suite of actions in play for the first three year period and we encourage the watershed to document this action in their work plan narrative.

#### *4. Objectives, and how well does the plan address them:*

- a. Improve the level and certainty of protection for habitat and the 22 existing Chinook populations.

Programmatic technical support Recognition that further analytical work is needed to reduce the uncertainty in the analytical support for both protection and restoration actions would strengthen the demonstrated linkages of the work plans to the hypotheses and strategy for their watershed. For example, the level of documentation and empirical support for the assumptions on land use changes was identified in the TRT review as a significance technical gap that needs further analytical work. Continuing updates to the actions to explicitly address improvements being made would be needed to maintain the strengths of the links.

We are encouraged by the progress being made on analytical support. We also want to encourage new analyses to more fully incorporate diversity and spatial structure into assessments of viability for the two populations. We can provide further information on recent work on this topic and further discuss how applications may relate to remaining uncertainties in the Puyallup watershed.

H-integration continues to be a priority need for this plan to direct the H's toward a common goal in a coordinated and efficient manner. The work plan narrative demonstrates that the involved parties' technical workgroups are continuing to make significant progress in reducing uncertainties and focusing actions on improving viability of the populations. A potentially fatal gap remains in the form of the continuing uncertainty of protection for White River population integrity. In addition, H-integration has not yet been broadened to effectively encompass all Hs and environments.

- b. Preserve options for achieving the future role of this population in the ESU

See the discussion in #1 noting the need for a Regional initiative to secure the opportunity to recovery the White River population.

Also see the discussion in #2 noting the need for the watershed to focus on first securing the opportunity to recovery the Puyallup River population.

The monitoring actions contemplated demonstrate that the watershed is initiating efforts in this direction. However, until a completed adaptive management plan provides a comprehensive framework and action plan this remains as a significant limitation for preserving options.

c. Ensure protection and restoration preserves and restores ecosystem processes for Chinook.

Again, see #s 1 and 2 above.

d. Advance the coordinated/integrated management of harvest, hatchery and habitat.

Some progress has been made and more work remains to be done as already noted above.

## **II. Policy Review Comments**

The Recovery Council Work Group, an interdisciplinary policy team, evaluated each of the fourteen watershed work plans. The following questions guided the evaluation of the work plans updates.

1. Is the work program update consistent with the policy feedback and recommendations from the 2004 policy feedback summary, Recovery Plan Watershed Profiles - Results section, and NOAA's Federal Supplement?
2. Is the work program update tied to the objectives identified and at a pace sufficient to achieve the watershed's ten-year goals?
3. Are there significant elements missing and how might these be addressed?

In addressing these three questions, the interdisciplinary team noted accomplishments and strengths of the three year work program update and also identified and discussed gaps and special issues warranting attention. A short discussion of comments common to all watersheds is provided below, followed by comments specific to the Puyallup/White watershed.

### **General comments on 2007 watershed work program updates**

Although the watershed 2007 work program updates reflect advancement in terms of project identification, many of the watersheds continue to have gaps, to varying degrees, that were identified in the 2006 work program review. Regional assistance to the watershed planning teams will be needed to address how best to fill the needs identified below.

*Work Plan Accomplishments, Sequencing and Prioritization:* Work program updates are a useful tool for defining progress toward plan goals and ESU-wide recovery. Narratives should be crafted to give a sharper focus on what each watershed expects to accomplish within the three-year period and identifying alternatives if they are unable to implement a given suite of actions. All work program updates could be strengthened by providing more focus on how projects and actions are prioritized and sequenced. It is also important that the narrative provide sufficient information to enable watershed teams and regional reviewers to determine whether the pace of implementation is appropriate to achieve each watershed's ten- year goals.

*Integrated Management of Habitat, Harvest and Hatcheries:* All Puget Sound watersheds' work programs would benefit from additional efforts to achieve H-Integration. During 2006, all watersheds with Chinook populations have engaged in actions that reflect increased attention to the integrated management of habitat, harvest and hatchery. By the end of 2008, it is anticipated that those watersheds will have completed or substantially advanced efforts to accomplish the 6 Step process developed at the regional level by the H-Integration sub-group of the Adaptive Management and Monitoring Steering Committee. The Shared Strategy and TRT liaisons will continue to assist watersheds without independent Chinook populations concerning integrated management and the capacity of the nearshore to sustain natural- and hatchery-origin populations of all salmonids.

*Monitoring and Adaptive Management:* A regional monitoring and adaptive management plan is currently being drafted by Shared Strategy staff along with a work group of technical experts, which will guide monitoring efforts at the regional and fish population scales. Some watersheds have already begun putting together their own monitoring and adaptive management frameworks and initial monitoring tasks. The regional team will coordinate with those watersheds to ensure that both of the monitoring and adaptive management plans are consistent and complementary with each other. During the intervening time, the Shared Strategy staff, work group and TRT acknowledge that they play an important role in providing assistance during the coming year to ensure that all Puget Sound watersheds can engage in a coordinated and efficient process to develop, refine and implement a robust monitoring and adaptive management approach. This will enable watersheds and the region to assess progress in reducing uncertainties in the population and ESU-wide recovery. Shared Strategy anticipates that the regional plan will be adopted by the Recovery Council by the end of 2007. In the meantime, the Puget Sound TRT and Shared Strategy liaisons will assist watersheds who are poised to take the next steps in the development of their watershed monitoring and adaptive management plans.

*Protecting and restoring ecosystem processes for Chinook and other species by preserving options and addressing threats* are critical components of recovery planning both at the local and regional scale. Recovery actions have progressed from relatively straightforward work to complex and more expensive multi-year projects. All watersheds are challenged in terms of their capacity to acquire land in order to secure future options, and to implement the large-scale projects. The Shared Strategy staff and work group members acknowledge that additional efforts are needed at the regional scale to assist in securing resources that will

enable watersheds to protect restoration options in rapidly developing areas and to implement projects at an appropriate pace to achieve ESU-wide recovery.

*Water quality and Water Quantity:* Water quality and water quantity will continue to be important issues for the long-term recovery of all populations within the ESU.

Work on water quality issues is within the authority of the Washington State Department of Ecology and will be primarily pursued through its implementation of the NPDES permit program and the establishment of TMDLs under the Clean Water Act throughout the ESU. However, watersheds can play an important role in ensuring that local jurisdictions implementing NPDES permits adopt water quality programs that include actions and regulations that protect and enhance water quality in rivers and streams that are critical for salmon recovery.

At the regional level, a work group has been established on instream flows to determine how to move forward the protection strategy identified in the Recovery plan. At present, the Plan calls for a 3-pronged approach to improving instream flows: (1) setting and/or revising instream flows under the authority of the Department of Ecology; (2) improving our scientific understanding of fish population needs in relation to instream flows, groundwater dynamics and relationship to surface water, as well as the implications of climate change on instream flows over time; and (3) coordinating water management decisions and actions within each watershed to avoid further degradation of instream flow conditions through the creation of Protection and Enhancement Programs (PEPs). Watersheds will play an important role in moving these issues forward in the near term. Each watershed should consider (1) advocating for appropriate instream flow rules in places where they are needed; (2) participating in the development of new science by sending technical staff to instream flow workshops planned in 2007; and (3) working with the Department of Ecology to begin creating PEPs in areas where instream flows hinder the recovery of fish populations. The TRT and Shared Strategy liaisons will assist watersheds in advancing water quantity and water quality actions.

### **Comments specific to the Puyallup/White and Chambers/Clover Creek work program update**

The work program update reflects capital and non-capital projects and actions that are consistent with the previous policy feedback, and is tied to objectives identified in the watershed's ten-year goals. There is insufficient information to determine whether actions are being implemented at a pace sufficient to achieve the watershed's ten-year goals. Though significant issues remain, advances have been made in addressing concerns expressed in previous comments, as noted below.

#### *Significant advances:*

- H-Integration work has been initiated between Pierce County, WDFW and the Puyallup Tribe technical staff;
- Stock monitoring and hatchery projects are included in project list;

- The update reflects broadened participation for watershed councils;
- Habitat limiting factors associated with each habitat capital project are noted; and
- Project list includes requests for funds for Pierce County jurisdictions' early SMP updates.

*Issues needing advancement:*

- The H-Integration effort for the White River early Chinook has not been initiated; long-term recovery goals have not yet been identified and adopted for the Puyallup Chinook population and the White River early Chinook population;
- Previous comments have expressed concern that an indigenous stock protection strategy was missing from the work program and identified it as an immediate action item that affects all Hs. This remains a key gap and a high priority need; and
- The 2006 comments included questions about an adaptive management framework or plan. It is expected that recovery plan uncertainties will be reduced through the development and implementation of a robust monitoring and adaptive management plan. Although regional direction will be forthcoming, the watershed would benefit from beginning now to craft specific predictions and triggers derived from hypotheses, indicators and metrics that allow early action-specific information to be used in a longer term assessment of ecosystem function and population response.