

# **Shared Strategy for Puget Sound Comments on April 2007 Three Year Work Program Update (South Sound)**

## 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
- 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 resolved it, and provide suggestions, if the issues were not resolved, 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 action sin 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? Is so, that are these and what can be done about them in the three-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 sections, 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 s 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 protection and restoration preserves and restores 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 fourteen individual watershed salmon recovery three-year work program updates in April and early May 2007. Three questions were addressed. The questions and the TRT’s review comments are below.

### **South Puget Sound Planning Area**

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

The questions and TRT’s review comments on the South Puget Sound Planning Area three-year work program, as revised based on discussions with the watershed technical group in June of 2007, follows.

The TRT will review watersheds’ work programs and provide written feedback answering three questions:

1. *Is their work program 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).*

Generally, this plan clearly addresses previous TRT recommendations, point by point. The responses to the 2006 comments and the narrative supplements demonstrate progress on several fronts. Most of the obvious gaps are acknowledged in the “Puget Sound Review” section of the 3-year plan. Those gaps include: linking actions to VSP parameters, H-integration, gaining an understanding of hatchery-wild interactions, projects aimed at habitat protection/acquisition, etc.

The materials provided by the South Sound group for TRT review included an updated annotated projects list, responses to the 2006 work program review comments, additional narrative supplements, as well as, discussions and commitments for follow-up written descriptions of non-capitol elements missing from the initial update. In total, the documentation appears to provide a relatively thorough description on how the South Sound group is advancing both their overall work plan, and approaches to implementing strategies.

In particular, new information has been offered to explain their approach to considering ecological interactions among hatchery and naturally produced groups of Chinook in South Sound marine waters as a basis to begin further work on H-integration to reduce the associated remaining uncertainties.

The nearshore assessment and restoration work plan elements continue to appear largely consistent with the overall approach laid out in the plan.

The authors state multiple times that the SPS recovery plan is an “all-species freshwater and marine recovery and sustainability plan,” which is a good approach for this sub-region. However, without linking their proposed actions directly to predicted benefits to Chinook, the certainty that it will contribute to desired salmon recovery objectives remains low. In the same manner, the lack of linkages between their proposed actions in freshwater areas and predicted benefits to the other salmon species also provides low certainty that conservation strategies and objectives for the other species are being advanced.

## *2. Is the sequencing and timing of their work program appropriate?*

The certainty in the plan’s outcomes for salmon and their habitats would be increased if sequencing of projects is considered. The South Sound watershed group has not directly discussed sequencing and has indicated that they are not sequencing their projects. However, their activities indicate they are considering some aspects of sequencing.

While no rationale has yet been developed for project prioritization in freshwater areas that relates to the hypotheses and strategy for the plan area, the update provides a discussion on a sequence of actions that demonstrates consistency with the 10 year objectives and recovery plan. The technical work group has indicated in recent discussions that a grant has been secured that provides capacity to take initial steps in developing linkages between freshwater areas and the plan hypotheses and strategy. Furthermore, the group has clarified that the freshwater projects have been placed in a priority tier that will require the above linkages become operational before

the projects will be pursued as a high priority. The above approach demonstrates that the group is actively sequencing actions and developing implementation strategies to fill identified gaps.

*3. Are there significant components missing from the work program? If so, what are these and what can be done about them in the three-year work program update or at a regional scale?*

If an overall strategic plan for how they will achieve their objectives is outlined, the certainty of the 3-year plan will be improved. The additional documentation of the groups' ongoing programmatic and project efforts on non-capitol elements that is now in progress or already provided will reduce uncertainties in work program consistency and outcomes.

Not enough information has been provided for interested parties external to each H workgroup to understand the status of the tasks and their relationship to the overall 10-year plan priorities. Including brief update discussions on integration of the work plan elements into an overall framework and a set of priorities would be a helpful step toward advancing the coordinated/integrated management of harvest, hatchery and habitat (item 4 d below). More details as to when plan updates will be completed and how they will be applied to reassess progress toward the the10-year plan priorities and guidance provided via the Regional Recovery Plan review processes would help all interested parties understand when these items can be expected to move off the "missing" list.

The initial review questions and comments were directed at getting a more clearly articulated rationale for how prioritization of actions related to hypotheses and strategy for the plan area. To reduce the uncertainty in the 3-year plan, it is important to provide an overall set of priorities and rationale for each within and among the diverse array of freshwater, nearshore and marine parts of the sub-basins. The response to the 2006 review included in the update was a good start in acknowledging the gap and discussing how to fill it.

However, more context would help to understand how this ongoing work and other work plan elements relate to the overall work plan and the project list. (E.g. when will the update to fill this gap be completed? Is this action a higher priority than the capitol projects the current method is generating? If not, can you explain why you believe the work plan is consistent with the recovery plan and guidance provided in the review process?)

As noted above in #1, the lack of a framework/rationale relating restoration project prioritization in freshwater areas to the hypotheses and strategy for the plan area leaves no basis for review of the consistency of these projects, or how well they relate to objectives. Given the current lack of information on how the freshwater projects relate to the plan, as compared to the relatively robust prioritization process for nearshore projects, more information would help improve the rationale for why freshwater projects are being pursued in the work plan and project list in lieu of more emphasis on nearshore projects and other non-capitol elements. Perhaps this is a sequencing issue having to do with capacity and readiness to proceed with these freshwater projects?

Documenting prioritization criteria and making the prioritization process explicit and transparent would also help reduce remaining uncertainties. For example, what are the criteria for ranking projects, and selecting among benefits to ecological processes and species? As an additional example, no explicit rationale was provided for the groups' decision to focus resources on restoration of the Nisqually River delta as the top restoration priority for the planning area. While we may sympathize with an emphasis on restoration of this major river delta for Chinook recovery, more carefully laying out a technical basis for the decision, that relates it to the plan hypotheses and strategy, would reduce uncertainties that this is the correct sequence for the planning area in total. Further work describing how priority protection and restoration actions will support and improve ecological processes and desired habitat functions relating to the hypotheses and strategies for each of the geographic sub-units at various spatial scales within the South Sound area will also reduce remaining uncertainties.

Three key gaps identified in the recovery plan and addressed in the comments to the initial work plan in 2006 remain to be addressed by the area work plan:

- 1) The hypothesized interaction between hatchery and wild fish in the South Sound region is not spelled out. As habitat recovery and hatchery improvement actions are put in place, what is the expected effect on hatchery and wild fish interactions? Where are hatchery origin and wild fish likely to co-occur, in what numbers, and for how long? What will be the likely outcomes of those interactions? How will they monitor these and make needed adjustments in hatchery or habitat strategies over time?
- 2) The work program would be strengthened by addressing how harvest strategies interact with hatchery and habitat strategies and how they may be adjusted over time as needed, e.g. fishing rates on hatchery stocks and their effects on wild fish recovery. Another question to be addressed is how harvest rate targets affect release numbers for hatchery fish, and how those rates affect the anticipated benefits of habitat projects. The fact that these issues remain unaddressed leaves a substantive component of the plan uncertainties unaddressed.
- 3) The priority need to develop an organizational structure and capacity for technical-policy deliberations that can maintain a focus on reducing the remaining uncertainties as well as direct other implementation objectives. We continue to expect that a unified and integrated approach will be very helpful in reducing the remaining uncertainties in this complex and diverse plan area. For the habitat strategy, our previous guidance to focus on better understanding ecological units that are relevant to the salmonid populations of interest and how those units function and respond will remain valid for addressing environmental factors.

We note here for clarity that the geographic scope of the technical analyses for the South Puget Sound chapter of the recovery plan and associated work plans encompasses the entire marine sub-basin and catchment south of the Tacoma Narrows. The certainty of plan implementation outcomes will likely improve in proportion to the capacity to focus on resolving ecological issues within each of the marine sub-basin ecological units, at

various spatial scales, and associated tributaries throughout WRAs 11, 12, 13, 14, and 15 in a manner that is transparent to the jurisdictional issues.

It is evident, from the materials provided via the initial 3 year work plan and the update, the entities associated with implementation of the South Sound plan have been engaged in further efforts to fill the identified gaps and they are making progress. We acknowledge that efforts are underway to further creation of an organizational structure and capacity for technical-policy deliberations. We also acknowledge that South Sound marine area and surrounding multi-watershed catchment is a complex geographic area, both ecologically and politically, and the dynamics that will drive the shape of that structure are (thankfully) beyond our technical purview.

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*

See comments above.

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

The South Sound area provides habitats supporting juvenile and sub-adult rearing and migration for the Puget Sound Chinook populations, primarily the Nisqually and White River populations. South Sound habitat and water quality/quantity affect Nisqually White River and other populations. The update continues to progress on the technical capacity to better understand the relationships of those habitats to the populations that can be applied within an adaptive management plan.

A key gap in the plan will remain until a working adaptive management plan that integrates the habitat, hatchery and harvest management strategies is in place.

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

The update further advances the technical basis for the plan hypotheses and strategies particularly in regard to documentation on nearshore physical ecological processes and how they may relate to strategies and actions for recovery.

The workplan also continues to advance non-capitol activities to develop the technical basis for relating water quantity and quality in upland areas to areas of marine water quality concerns. As these activities continue in the future, we also encourage efforts to link the activity back to the plan and review comments, as short explanations on how activities increase certainty in regard to the technical framework of the plan will help to start the process to create and strengthen robust linkages between the work plan elements and the hypotheses and strategy for their watershed.

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

The update provides preliminary analyses of the numbers of hatchery and natural Chinook that may be utilizing South Sound. The assessment sets the stage for further discussions and analyses on H-integration, though no further activities are described in this 3-year work program. The implementation of H-integration discussions and activities in this area has been delayed. In the PSTRT's view, many, if not most, of the participants necessary to consider integration are present in the work group. Beginning the initial discussions of integration, perhaps based on questions posed by the TRT in its working paper on Integration for Salmon Recovery (attached), will reduce the uncertainty associated with further delay.

## **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. Specific comments are provided below, followed by a short discussion of comments common to all watersheds.

### **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 South Sound Work Program Update**

#### **Significant Advancements:**

- The South Sound recovery unit has been focusing on strengthening their community support and organizational structure. The work plan identifies a single project, the Nisqually Refuge Estuary Restoration project, as the highest priority project across the basin. This decision represents an advancement in the decision-making structure for the basin.
- The work program update identifies an advancement in the nearshore assessment and in addressing water quality issues within the basin.
- Advancement is demonstrated in the update by linking projects in the update with specific limiting factors and benefiting species, and by providing additional specification of projects.
- Specific project gains have occurred for estuary restoration, fish access to estuaries, marine water quality, and freshwater riparian and habitat development.

#### **Issues Needing Advancement:**

- Prioritizing projects and programs to reflect the ecosystem-based, multi-species focus of the South Sound recovery plan is complex and requires a strong, multi-jurisdictional decision-making framework. As noted above, the South Sound has already started working on this structure. The South Sound recovery unit should continue to strengthen its organizational structure for making decisions that reflect the priorities across the basin.
- It will also be important to continue to strengthen the coordination among partners across the recovery unit as results of assessments are compiled. These results should help inform policy decisions for how to adaptively manage changing priority areas and actions.
- Documentation of the following is important for comprehensive reviews regarding work program consistency: 1) how the South Sound is integrating and prioritizing the different

areas and species across the basin; and 2) the significant work currently underway and proposed for the future related to programmatic and project actions.

- Discussions with the South Sound Technical Group have indicated that two key pieces of work are advancing: 1) linking freshwater priorities with the hypothesis and strategy for salmon recovery within the planning area; and 2) developing a framework and material to integrate the hatchery, harvest, and habitat pieces within the planning area.

Documentation of these actions underway and those planned is invaluable for the South Sound planning unit. This type of documentation will help to both track progress internally on this work and to demonstrate externally to reviewers and to project sponsors the advancement of salmon recovery within the planning area.

- Although capacity needs were not clearly identified in the work plan update, it is clear that there is a strong need for additional capacity within the planning area in order to advance salmon recovery per the technical feedback above. Identifying and articulating this need is an important step in building this capacity.