

## **Preliminary Comments on Habitat/Land Use Discussion Draft**

Science Question 1: We appreciate the acknowledgement that assessment of ecosystem process integrity is critical for understanding current conditions and assessing the extent of protection and restoration necessary to maintain a healthy Puget Sound. We cannot, however, allow “gaps” (p. 10) to stand in the way of action that we can take now to protect habitat.

Science Question 2: We agree that little is known about the effectiveness of efforts to protect and restore habitat from a site-specific standpoint. There is no reason whatsoever to expect consistency in the protection afforded by the GMA and SMA, primarily because of the delegation of the responsibilities to numerous local governments.

We support the statement that protection is the best approach to ensure long-term integrity of ecosystem processes and habitat conditions. We support the statement that restoration should be prioritized, and that watershed-based and other smart growth measures should be employed in other areas to minimize ecosystem impacts.

Policy Question 1: We appreciate the authors’ frank assessment of existing laws and politics. Ecosystem restoration is left to state and local governments; it is difficult for local leaders to implement significant changes to land use activities using regulatory approaches.

The GMA, when used well, is a powerful tool for local governments to concentrate growth, but it is not designed to slow the region’s growth as a whole. As an environmental protection tool, it has shortcomings, most of which are pointed out in the paper. Overall, we agree that the current system of regulatory tools for protection and restoration are fragmented, with conflicting goals and inconsistent outcomes, and that a comprehensive, consistent approach is needed to recover Puget Sound.

Policy Question 2: We agree with this important point: there is no comprehensive Puget Sound-wide ecosystem plan for protecting and restoring marine life and marine areas, including the nearshore. We agree with the bolded statement at the bottom of pp. 62-63.

The “Preliminary Policy Recommendations” on pp 66-69 are urgently needed. We particularly agree with:

- Protection as the preferred approach
- Establish clear standards that state when impacts are to be avoided at all costs, based on ecosystem processes.
- The region should discuss its vision for a future quality of life
- State-level integrated set of regulations that apply to lands, streams and marine areas to replace our present fragmented system of regulations.
- Adopt Pew Ocean Commission recommendations at federal level
- Require LID to reduce forest cover and impervious surfaces
- Wildlife planning at a watershed scale
- Address cumulative impacts
- Governance: a single agency or group charged with convening the region, reaching consensus on science, and a set of policies and actions to lead us to a healthy Sound.