



May 11, 2004

The Honorable Governor Gary Locke
Office of the Governor
P.O. Box 40002
Olympia, WA 98504-0002

Dear Governor Locke,

Thank you for this opportunity to provide comments on the U.S. Commission on Ocean Policy's preliminary report on the state of the nation's oceans. People For Puget Sound is a citizens' organization whose mission is to protect and restore Puget Sound and the Northwest Straits. We focus on improving water quality and preserving and restoring habitat to prevent further degradation of the Sound and to restore it to health.

Overall, we commend the Commission for developing the first comprehensive report on the health of the nation's oceans in over 30 years. The report does an excellent job of identifying the problems faced by our coastal and ocean ecosystems and outlining the need for major reforms at the federal, state, and local levels. The Commission's message is clear: our coasts and oceans are in trouble and policymakers must act quickly to reverse the degradation. We urge you in your comments to the Commission to underscore the seriousness of the problem and the critical need to implement and fund key recommendations.

Many of the problems outlined in the Commission's report are familiar to Puget Sound. For example, Puget Sound's salmon and orca whale populations are listed as endangered by the state, and in the case of salmon, also by the federal government. Shoreline modifications such as bulkheads and other structures have destroyed over one-third of Puget Sound shoreline habitat, nurseries for salmon and the species they feed on. Some bays have lost 90 percent of their salt marshes and forty percent of the Sound's shellfish beds are closed due to pollution.

Fortunately, the Commission's report contains dozens of recommendations that, if implemented, will help protect the Puget Sound ecosystem from collapse. Specifically, we urge you to support strong and quick actions to implement the following recommendations in your comments:

- **Strengthen Planning Capabilities of Coastal States and Discourage Inappropriate Growth in Fragile Areas**

To protect important coastal habitat for salmon, forage fish, birds, and other wildlife, we support the report's recommendation to strengthen the planning and coordination capabilities of coastal states. We also support the recommendation to change the federal funding and infrastructure programs to discourage inappropriate growth in

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shoreline master programs under Washington's Shoreline Management Act over the next few years.

- **Implement An Ecosystem-Based Approach For Coastal Management Decisions**
We support the recommendation to manage ocean and coastal resources using an ecosystem-based approach. This will better inform management decisions so that decisions are made based on the relationships among land- and water-ecosystems and will allow local decision makers to guide growth away from sensitive habitat. In particular, implementation of this recommendation will support the requirement for shoreline master programs to achieve no net loss of shoreline habitat and develop habitat restoration programs.

- **Establish Tough Requirements To Prevent Pollution, Especially For Stormwater and Septic Systems**
Pollution from point and nonpoint sources has led to a decline in Puget Sound orca and fish populations, severely impaired important habitat, and rendered many areas of Puget Sound unfit for swimming or fishing. Contaminated stormwater runoff sends millions of gallons of water with harmful pollutants, like copper, oil, mercury, fertilizers, and pesticides into the Sound.

We support immediate implementation of the Commission's recommendation to achieve significant reductions in pollution from nonpoint sources, such as stormwater pollution and agricultural runoff. However, this recommendation must be strengthened to include recommendations for stronger enforcement authority for state and local governments with regard to stormwater programs. Relying solely on voluntary and incentive based programs is an approach that has not worked in the past. We also support the recommendation that state and local governments adopt effective building codes and zoning ordinances to reduce septic system releases into coastal waters. As you know, lower Hood Canal has become a virtual dead zone due largely to stormwater pollution and failing septic systems.

- **Establish Marine Protected Areas**
To protect marine resources from fishing and other extractive industries, we support the creation of marine protected areas. A marine protected area serves as a refuge for all types of species and is protected from human disturbances and fishing pressures. Over 1000 scientists worldwide support the creation of marine protected areas as a way to improve fisheries and biodiversity in our oceans.
- **Strengthen Oil Spill Prevention Measures**
A 1997 Coast Guard study found that Puget Sound is overdue for a major oil spill. While we have made modest gains in the last few years towards reducing the risk of a spill, we should not wait for the next big spill to make further advances. We support the Commission's recommendation to strengthen oil spill prevention measures and improving marine safety inspections.

- **Improve Fisheries Management**

We support the Commission's recommendations on how to improve fisheries management, including separating allocation and assessment decisions, requiring that harvest limits be set by independent scientists, and developing regional bycatch reduction plans.

- **Create A National Oceans Council**

We support the creation of a nation Ocean Council and a system of regional Councils, an approach reflected in on our own Northwest Straits Commission. This will lead to better coordination of efforts to protect and restore coastal and ocean ecosystems and allow more localized policy planning.

While all of these recommendations are critical to restoring and protecting Puget Sound and the rest of the nation's marine resources, policy change will not occur unless the recommendations are backed by strong actions and ample funding. Unfortunately, the Commission's report fails to provide guidance on the specific actions that will be needed to implement the recommendations. The report also does not outline the funding that will be necessary to make the report's recommendations a reality. Thus, we urge you in your comments to make clear to the Commission the need to include in the final report the specific actions and funding that will be necessary to implement the report's recommendations.

We appreciate your continuing support for protecting Puget Sound. We urge you to continue that support through strong comments to the Commission. We also urge you to advocate to the Commission and our Congressional delegation for strong national policies to protect and restore Puget Sound and other marine ecosystems.

The Commission's report also provides a strong basis for action at the state and local level, regardless of the pace of federal action to implement the Commission's recommendations. We urge you to consider actions you could take in Washington State that would respond to the Commission's findings. Such actions would include:

- An Executive Order directing the agencies under your control to identify and take actions that implement the Commission's recommendations.
- Stepped-up enforcement of water quality permits and regulations.
- A 2005-07 Biennial Budget that provides increased funding for Puget Sound and coastal protection and restoration.
- A "Puget Sound agenda" for the coming session of the legislature.

Thank you for your attention to these important issues. Your support for changes in federal and state ocean policies will help prevent the collapse of the Puget Sound ecosystem—an ecosystem that is so important culturally, environmentally, and economically to our state.

We look forward to working with you as you address these issues in Washington State.

Sincerely,

A handwritten signature in black ink that reads "Kathy Fletcher". The signature is written in a cursive style with a large, sweeping initial "K".

Kathy Fletcher
Executive Director