



King County

Department of Natural Resources and Parks

Director's Office

King Street Center
201 South Jackson Street, Suite 700
Seattle, WA 98104-3855

August 9, 2012

Angela Bonifaci
US EPA Region 10
1200 6TH Ave., Suite 900
Seattle, WA 98101

Dear Ms. Bonifaci:

Thank you for the opportunity to comment on the Lead Organization (LO's) model for selecting and funding projects in support of the Puget Sound Action Agenda. King County has consistently supported the development and implementation of the Action Agenda, including the need for an effective integrated funding strategy. To this end, it is our firm belief that funding should go to the highest priorities and to the agencies that can implement priorities most effectively and efficiently. It is unclear whether this is happening with this first round of funding due to the lack of information and transparency in the process of selecting projects.

However, we do know that the current model of channeling funds through several LO's compartmentalizes our approach to implementing the Agenda.

While we greatly appreciate the availability of federal funding, we have similar concerns as those expressed by the South Central Caucus Group regarding the effectiveness of the process, particularly the transparency, the opportunity for input, and the clear linkage of funding to Action Area priorities. We hope you will give our answers as well as those of other stakeholders your best consideration when providing direction to allocation of federal funding, either through the LO's or future process that may emerge.

1. *Has the LO model improved our ability to effectively focus resources on the implementation of the Action Agenda or has it not been useful in this regard?*
 - Compartmentalizing action agenda items into separate funding categories thwarts economies of scale and misses the opportunity of selecting projects that promote an integrative approach. Funding efficiencies and greater project synergy would be realized through a closer coordination between the LO's in soliciting, selecting and funding projects. Further benefits would be achieved by coordinating recipient contracts across funding categories similarly to the Recreation and Conservation

Office of Ecology's combined state and federal Water Quality Financial Assistance program.

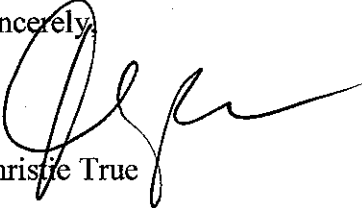
- In terms of implementing the Action Agenda, we agree with the South Central Caucus Group and other stakeholders such as Pierce County that it is difficult to answer this question due to the difficulty of evaluating the allocation process among many LO's and a lack of information on the selection process. However, as far as the four grants we received, we feel that they are helping King County implement the Action Agenda.
2. *How successful has the LO approach been in promoting shared decision-making among the Management Conference and other Puget Sound stakeholders?*
- We are concerned that the LO process has not promoted shared decision making, based on comments of members participating on advisory committees (we concur with the SCCG letter concerning this oversight). The LOs have not always provided sufficient time for the Cross Partnership Lead Organization Strategic Advisory Groups to review and provide meaningful comment on funding round proposals or the 6-year funding plans. We recommend that the Cross Partnership Advisory Groups be provided ample time to provide input and that coordinating with these advisory bodies, LIO's, and the Ecosystem Coordinating Board be given a much more prominent role in the decision-making process. It is also important to include avenues of input for both large and small stakeholders.
 - We believe that the RFP's from LO's need to more fully articulate their vetting and scoring process and clearly state how proposal debriefing will be carried out.
 - In addition, a more in-depth engagement with the Advisory Groups and the Science Panel on the 6-Year plan may be advisable.
3. *On what basis could future Puget Sound funding allocations be distributed among the LOs? Is there some minimum EPA appropriation level at which this model no longer makes sense?*
- Future RFP's 1) should articulate the language of the Action Agenda, 2) ascertain that the body of the proposal follows a clear path in addressing action items and 3) develop criteria whose performance measures directly answer Action Agenda items. The above should be stated unambiguously to all applicants.
 - We recommend a mix of large and small grants, the smaller ones (\$10,000-\$50,000) should be locally vetted and sub-awarded following a block grant approach. Large projects should be in the range of \$300,000 to \$500,000 in order to have an impact. To make funding go farther, encourage regional approaches where several agencies can partner on the same project.
 - Any application process should be scaled in complexity according to the size of the award.

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Please note that our comments are similar to the previously submitted letters from Deputy King County Executive Fred Jarrett (attached). The first one addressed to Gerry O'Keefe and dated 10/5/11 articulates the South Central Puget Sound Action Area's priorities in updating the Action Agenda and suggest that when practicable they be reflected in future RFP's. The second letter is addressed to Dennis McLarren, dated June 23, 2010, comments on the proposed grant allocation plan for FY 2010

In closing, we support the views expressed by other stakeholders and particularly the South Central Action Area Caucus. We appreciate the EPA's continued support in funding Action Agenda priorities, and as an entity involved with implementing many priority actions, we look forward to working with the EPA and LO's to ensure that it is most effectively and appropriately allocated.

Sincerely,



Christie True

cc: Mark Isaacson, Division Director, Water and Land Resources Division (WLRD),
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Joanna Richey, Assistant Division Director, WLRD, DNRP
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