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August 22, 2012

Angela Bonifaci
US EPA Region 10
1200 6th Avenue, Suite 900
Seattle, WA 98101

Dear Ms. Bonifaci:

On behalf of the South Central Action Area Caucus Group, I appreciate the opportunity to provide input on how the Lead Organization (LO) model for allocation of National Estuary funding is working in our action area.

The Local Integrating Organization (LIO) for the South Central Action Area is the South Central Caucus, which includes WRIAs 8, 9 and 10 and encompasses extensively developed urban areas, rural areas and resource lands in King and Pierce Counties. This Action Area has a long track record of collaboration at the watershed level to recover salmon, and a shared commitment to protect and recover Puget Sound. Many parties are making investments across Puget Sound, with much of the on-the-ground work being undertaken at the local level. It's essential that we're all pulling together, and that limited resources are carefully aligned with the Strategic initiatives and recovery targets in the Action Agenda.

We value the Environmental Protection Agency (EPA)'s commitment to cleaning up Puget Sound. We recognize that projects of merit have been funded through this process and greatly appreciate the hard work of the LOs in managing the initial grant rounds. However, we believe that the process could be made more transparent and streamlined, and that the allocation of grant funding needs to be more closely aligned with the recently updated adopted Puget Sound Action Agenda and adopted salmon recovery plans. Action Agenda priorities, and not LO structure, should drive grant funding priorities.

Our comments are focused on the processes for the competitive grant categories most relevant to our Caucus Group: Watershed Protection and Restoration, Marine and Nearshore, Toxics and Nutrients Reduction and Prevention, and Pathogen Reduction and Prevention.

Our observations and concerns with the current process are outlined below in response to the first two questions in your survey, followed by suggestions for improvements to the funding allocation model and approach.

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?

It is difficult to evaluate the model's effectiveness in focusing resources for implementation because this critical set of funding strategies (the 6-year funding plan) and its relationship to achieving Action Agenda priorities has not been discussed with the advisory committees established to advise the LOs.

The current model, focused on LOs, tends to compartmentalize the grant funding strategies and decision-making within agencies and makes it difficult to evaluate how the projects funded in each category could be integrated to more effectively advance Puget Sound recovery goals. When the LO structure was initially developed, our caucus group expressed concern about a lack of clear focus on implementing adopted salmon recovery plans, and continues to voice this concern after seeing several funding rounds.

Looking forward, the recent identification of three Strategic Initiatives in the updated Action Agenda raises the question of whether the current LO funding categories need to be revisited to ensure that grant funding is focused on the highest priorities in the Action Agenda.

2. How successful has the LO approach been in promoting shared decision-making among the Management Conference and other Puget Sound stakeholder?

From the perspective of the South Central Caucus Group, the current LO approach does not appear to promote shared decision-making. Although two Cross-Partnership Strategic Advisory Groups (one for Watershed and Marine/Nearshore topics and one for the pollution topics) were formed with a wide range of representatives to review the funding proposals with each Lead Organization, these advisory groups are being underutilized and other interested parties are not being heard and considered in a timely manner.

As currently operated, the two advisory groups do not have a meaningful role in crafting the proposals on the front end; nor have they had timely opportunities to provide input once proposals are drafted. To meet the intent of shared decision-making, there needs to be adequate opportunity to get feedback from constituencies and to provide timely advice and relevant feedback on the six-year funding strategy, as well as the annual grants.

The role of the LIOs and local priorities in the distribution of National Estuary Program funds also remains unclear. LIOs have been asked to weigh in on the consistency of grant

proposals with local Action Agenda priorities. However, the review expectations are unclear and many around the table need to recuse themselves as grant applicants.

Local entities, including local governments, non-profits, and community groups play a critical role in implementing Action Agenda priorities. The LO funding strategy should more clearly identify the role of these groups in the 6-year funding strategy. At present, urban LIOs are not represented on the Watershed and Marine/Nearshore Advisory Group, where there is a high level of threat due to development pressure and need for restoration work

The Caucus offers the following suggestions for better aligning grant funding decisions with the Action Agenda and adopted salmon recovery plans, streamlining the application process, simplifying grant administration, and providing for meaningful input from advisory committees and LIOs:

1. **Ensure that Action Agenda priorities rather than LO categories drive funding decisions; establish one process for ranking projects which focuses on Action Agenda priorities:** Establish strong guidelines for ranking projects based on identified priorities in the Action Agenda. One ranking process can provide greater transparency and demonstrate that we are collectively making investments with the maximum benefit to Puget Sound. Once projects have been identified for funding, they can then be assigned to the appropriate LO for grant administration.
2. **Implement one process for applications:** It can be challenging for small local governments and organizations with limited resources to participate in a process with multiple application requirements and timelines. Creating a single application process would be more efficient and is likely to increase participation.
3. **More clearly direct a portion of this funding to local priorities and adopted watershed based Salmon recovery plans:** EPA should consider more direct funding for local entities to implement local priorities and strategic initiatives, provided they are consistent with the Action Agenda. For example, the Action Agenda has identified habitat protection as a strategic initiative that will require advocacy, funding assistance and collaboration with tribal efforts to successfully meet the 2020 recovery targets.
4. **Provide for more meaningful input from Advisory Groups:** More frequent, short meetings, timed to allow for input from constituents and a robust discussion up front, would allow for more meaningful input into alignment of grant funding with the action agenda, and integration of actions across LOs.
5. **Improve communication among LOs, advisory groups, and LIOs:** The Puget Sound Partnership can coordinate these efforts by assisting in improving coordination with LIOs and LOs and stakeholders. With the adoption of the updated Action Agenda, including Strategic Initiatives, we have a clearer blueprint for focused investment and shared decision-making. Improving communication between LOs and Advisory Groups and in turn the LIOs will assist in articulating the value of these public investments. Adding representatives from the more urban LIOs to the Watershed and Marine Nearshore

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Advisory Group and more explicitly recognizing the role of local entities in the 6-year funding strategy would also help to strengthen shared decision-making.

We thank you for the opportunity to comment. The EPA is our valued partner and we look forward to our continued and critical work of recovering the Puget Sound.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Jarrett", with a long horizontal stroke extending to the left.

Fred Jarrett
Deputy King County Executive
Chair, South Central Action Area Caucus Group

cc: De'Sean Quinn, Water Quality Planner, King County Wastewater Treatment Division
Susan O'Neil, Ecosystem Recovery Coordinator, Puget Sound Partnership