

# Snohomish Stillaguamish LIO

## LIO Committee Members and NTA Owners Comments: 2016 Action Agenda NTA Submittal Process and New EPA Funding Model

March 15, 2015

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### 2016 Action Agenda NTA Submittal Process

#### **A. The process for developing the NTAs was resource- intensive, and can be cost-prohibitive for smaller organizations.**

- “The process set up by the Puget Sound Partnership and EPA should be clear and transparent to provide the most optimal results and should allow the appropriate conversations to happen. Unfortunately, this was not our experience in the recent 2-year NTA process. XXX staff found directions to submit these NTAs confusing and as a result the XXX NTAs were not submitted through the PSP portal, although they were submitted and ranked through the Snohomish-Stillaguamish Local Integrating Organization (LIO). The end of this NTA process left out any information and rankings from our LIO in the mad dash for each individual NTA owner to submit through the PSP portal.”
- “It cost us over \$4,000 in staff time and resources to submit one NTA we own entirely and participate significantly in two other NTAs with partners. For a small nonprofit with an annual budget of \$600,000 90% of which is grant funded this is a significant hit, especially when this is unfunded time (not covered by grants). For every LIO meeting I attend it costs us almost \$200 for my time, mileage and parking, also unfunded. While this is "the cost of doing business" this expense is much easier for larger entities like Tribes, counties, cities and larger nonprofits to absorb.”
- “Doing a NTA list every two years at this level of effort is not sustainable, and participation in the effort is likely to diminish.”
- “PSP related meetings and processes need to be combined (NTA, SRFB, MAM, 3-year work plan, Salmon Recovery Plan, PSAR, Large Cap, etc.). Specific opportunity is where committed stakeholders are willing to combine or adapt their long standing watershed committee to serve as the LIO. This would advance the evolution from salmon only ecosystem recovery to vital sign ecosystem recovery, reduce the number of meetings, set a good example of reducing our cumulative carbon footprint by keeping meetings local, and provide short travel opportunity for local elected officials to participate in ecosystem recovery.”
- “The amount of time spent on developing NTAs was very similar to what is expected for most grant programs with any guarantee for funding. If this is strictly a planning list of projects, the process should be more akin to the streamlined lead entity’s 4-year work plan.”

#### **B. The process of submitting the NTAs through PSP’s portal was overly complex.**

- “Having to submit an application four times to just get on a list is impractical. (kudos to the local and PSP staff that did their best to support applicants).”
- “The intent of a results chain is understood, but are they really needed or being used to prioritize projects? Does the benefit or outcome of results chains justify the level of effort needed to provide the results chains?”
- “Cross cutting strategies such as k-12 education need to have their own results chains.”
- “The spreadsheet had errors and was very labor intensive to use. Cut and paste functions didn’t work or if they did, it deleted formatting that I couldn’t undo. Specifically the Objectives section. If you needed to move things around it wiped out the drop down menus. Couldn’t get them back tried calling contacts regarding this as it happened right before a critical due date. The first contact was out of office and the person they suggested we call as a backup was also out of

office. Not handy, I had to condense objectives to make it fit in the rows with drop down menus. I could not use the bottom 5 rows. During critical times we should be able to get someone live to help us!"

- "We spend MUCH less time simply applying directly for grants the "traditional way". We are unsure what benefit this multi-step NTA process provides for the cost and time it takes to go through. It feels like PSP is pushing off work they should be doing onto the LIOs and the applicants with no guarantee funds will be available. Other grantors certainly require that proposed projects demonstrate they are working towards meeting needs identified in regional or basin plans. At the most other grantors have TMDL check lists or ask for HUC codes but rarely do they ask us to learn a confusing priority/vital signs matrix and headache inducing results chain and then jump through hoops to cross reference and plug our projects into them. What is the point of this?"
- "PSP and the SI leads need to make it clear when activities/actions are leading to "NTA" development and when activities/actions are leading to "funding" decisions. The most recent process tried to combine both, and as a result it missed the mark on both ~ too much time, effort, energy, detail, etc. for NTA development and not enough detail and process for funding decisions."
- "As executive director for XXX, if I had known the NTA process would have been such a headache and cost us so much time & money back in October I would have not had my staff submit any NTAs. The same amount of money could have been put towards applying for several grants and fundraising. If PSP values participation of small local nonprofits, especially the XXX then there needs to be consideration of the impact the process has on us. Either streamline the process and make it a simple and direct application for dedicated funds OR if this process is considered collectively valuable (for whatever unknown reason) then provide capacity funds to help defray costs associated with the multi-phase application process."
- "Sno-Stilly LIO staff did an excellent job of keeping NTA proposal owners informed about the 2016 NTA process, which was inherently complex and drawn out over a long period of time."
- "Given the complexities of multi-stakeholder ecosystem management, I think PSP did a reasonably good job of setting up and administering the 2016 NTA process."

**C. The deadline for NTA submittals during the holidays was difficult to meet.**

- "The timing of the due dates was very inconvenient and condensed, they coincided with all the end of year holidays. Our office closes for 2 weeks at Christmas time."

**D. The quality and usefulness of SITT reviewer feedback on some NTAs was inconsistent.**

- "SITT feedback on (xxx) NTA proposal indicated to me that the reviewers did not have expertise or familiarity with (xxx) [our] programs."
- "I appreciated the feedback but in some cases it was conflicting and hard to compile."
- "Feedback re. NTAs from the SITTs was inconsistent across NTAs, which then put NTAs which received less feedback and less constructive criticism at a disadvantage. Alternatively, if the SITTs are in place and they feel that an NTA is fatally flawed or has no chance of advancing, the feedback should be frank and straightforward to avoid wasting everyone's time."
- "There seems to be disconnect between local expertise and determination of priorities and the SITTs. PSP asked the LIOs to invest considerable effort developing NTAs. NTAs were advanced with buy-in from the LIOs. Presumably the LIOs exist because they are comprised of the experts on local issues, limiting factors and watershed needs. Why is the extra layer above them needed? Are the SITTs as familiar with basin issues as the LIO members who live and work it every day? If the extra layer is in place they should work more collaboratively with the LIOs to develop effective NTAs."

**E. The process of developing the Ecosystem Recovery Plan for the Priority Vital Signs and the Two-Year Implementation Plan (NTAs) did not incorporate public input, although the public has a role in resource management.**

- “What is the role of the local citizenry in this process? How do we engage the public and private landowners as active support groups in the funding and implementation of the AA and in Puget Sound recovery? Private landowners play a critical part in natural resource management and the results that we are all striving for in this effort to recover Puget Sound. We all need to recognize the connection and the value.”

**New EPA Funding Model**

**A. Our committee members engaged in the new Ecosystem Recovery planning process based on PSP’s characterization of this process as an endorsed path toward increasing local control in funding; yet now, after NTA owners have made a significant investment of time and resources, this premise appears to have changed.**

- “LIOs invested a lot of time, effort, and energy into the current process. That investment will need to bear fruit, or that investment of time will not be made in the future. The LIOs participated in good faith and anticipated that there could be more local funding available via the new process; therefore, they were willing to invest the additional time. If there isn’t the opportunity for local funding in the future, then the investment of time will be less in the future.”
- “The funding model that was shared at the outset of the local NTA process included two funding streams – one locally determined through the LIO and one through regional SIT Teams. Simply removing the local funding stream, after all of the NTA proponents have worked in good faith to follow the steps of the process, is not acceptable for the following reasons:
  - The regional SITTs do not have the local context in which to prioritize distribution of funds that will best achieve watershed scale / LIO area ecosystem recovery.
  - Comparing locally meaningful NTAs against NTAs with regional reach and impact puts the local projects at a distinct disadvantage.
  - Aborting the local distribution of funds, as outlined earlier, will result in competition between organizations as well as a great deal of lost political capital given what will be perceived as a ‘bait and switch’ approach to the generation and funding of NTAs.
  - NTA proponents received no notification of the complete review criteria that will be used in the SITT ranking of proposals across watersheds before submitting their NTA proposals.
  - There is no information on who will be in the permanent SITTs and how they will be selected.
  - Cross-cutting proposals in education, research / monitoring and enforcement will be at a disadvantage with the proposed review process of having two SITTS review these proposals. While each SITT may have topical experts in stormwater, habitat and shellfish, SITT representation may not have the necessary programmatic expertise to assess / evaluate projects in these cross-cutting fields.”
- “Changing the funding model in the middle of the process creates distrust on the part of the local governments and organizations. Puget Sound recovery will be achieved by on-the-ground implementation of projects, not in paper dreams, arbitrary deadlines or comments from experts out of touch with local issues and context. XX government will not participate if EPA/PSP management are unable to create a fair, transparent and dependable process for Puget Sound recovery.”

**B. We recommend a path forward that incorporates local input into funding decisions.**

- “The Puget Sound Partnership (PSP) and the 3 Strategic Initiative (SI) leads need to find ways to engage the LIOs in the funding process and the funding outcomes. Otherwise, the LIOs will lose interest and become disenfranchised; and will not provide the support (or will not support) PSP and the state agencies implementing the strategic initiatives at the local level. Can PSP and the SI leads work with the LIOs to create specific funding requests (to the Governor and Washington State legislature) unique to each LIO?”
- “The previous NEP grant approval and administration worked fine. It was the allocation of funding that created the dissatisfaction. The LO’s were taking significant cuts off the top, minimizing funding being passed down to the LIO’s to achieve on the ground actions. EPA could simply limit the amount of funding taken off the top from those that won the competitive process of delegating the funding, with the understanding they would be fully funded for the administrative costs of running the NEP grant program.”
- “An acceptable path forward will involve a simplified NTA process as well as a clearly defined process for LIOs to directly allocate funding to projects. LIOs have the expertise and structure to execute science based grant allocation decisions. The successful lead entity led Salmon Recovery Funding Board grant process is a great model of how the LIOs could move forward to allocate federal funding for environmental projects. If this is not the direction PSP and EPA would like to move, they would essentially render the LIOs duplicative and obsolete.”
- “EPA and PSP need to be forthright in clearly explaining how future funding allocations will be made. To date, information has trickled out to LIO through a confusing barrage of FAQs and information meetings. LIOs need certainty around funding allocations so they can determine as local Action Agenda partners if this process is worth their collective time and effort.”

**Other Comments Received**

1. “These comments should be directed to EPA, not just the Puget Sound Partnership. It seems like EPA is making decisions and PSP is trying to prepare for them and respond to them.”
2. “Separate the funding process from the Action Agenda List creation.”