







Strait Ecosystem Recovery Network LIO

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November 26, 2014

Angela Bonifaci, Puget Sound Team Lead EPA Region 10 1200 Sixth Avenue, Suite 900 Seattle, WA 98101 Bonifaci.angela@epa.gov

Re: Comments on EPA's Straw Funding Models for EPA Puget Sound Geographic Program

Appropriation in FY16 and Beyond

Dear Ms. Bonifaci:

Thank you for recently convening Puget Sound tribal and local jurisdictions, as represented through Local Integrating Organizations, to discuss potential changes to the way that National Estuary Program funding is distributed in the Puget Sound Basin. At the meeting on September 26, 2014 in Edmonds you and your team were candid and clear about EPA's needs and interests for any funding approach and we believe the conversation advanced this important issue significantly.

In response to the opportunity to comment on the potential funding models presented at the September 26th meeting, this letter conveys an alternative recommended method for the distribution of National Estuary Program funding. This alternative model is endorsed by five local integrating organizations and by Puget Sound tribal governments via the Northwest Indian Fisheries Commission's Board of Commissioners. It is our understanding that the Northwest Indian Fisheries Commission will be submitting a separate letter to EPA supporting the alternative model.

Our proposal suggests that EPA develop and implement a National Estuary Program funding approach for Puget Sound similar to the one used for Salmon Recovery Funding in watersheds. That process is well understood, effective, and has broad based support. At the center of this alternative model is a commitment to allocate a portion of available funds to implementation of high priority locally identified actions that are consistent with regional recovery strategies as demonstrated by inclusion in the Comprehensive Conservation and Management Plan (the Puget Sound Action Agenda).

The attached document presents a flow chart of the NWIFC/LIO model, for comparison to those outlined by EPA on September 26th.

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We thank you for your consideration of our ideas and we look forward to working with you to deliver NEP funding to the highest priority actions and to protect and restore this special place that we all call home. We know there are many details to work out, and we would welcome the chance to meet with you to more fully describe our model and talk about how it can best meet your and our interests.

Respectfully,

Pat McCarthy

Chair, Alliance for a Healthy South Sound

Pierce County Executive

Fred Jarrett

Chair, South Central Action Area Caucus Group

King County Deputy Executive

Scott Brewer

Executive Director, Hood Canal

Coordinating Council

Dave Somers

Chair, Snohomish-Stillaguamish

LIO Executive Committee

Steve Tharinger

Representative, 24th District

Strait ERN LIO Co-Chair

Attachment

cc: Sheida Sahandy, Puget Sound Partnership

Joint Northwest Indian Fisheries Commission and Local Integrating Organization Proposal for an Alternative Approach to Allocation of NEP Funding in 2016 and Beyond —November, 2014

EPA

Analogous to SRFB/PSAR Approach



Funding Administration Agency: RCO

Policy Body: PSP Leadership Council



Independent Scientific Review Board nominated by State & federal agencies and tribes.

Supported by NEP funds; staffed by PSP. Reviews technical merits and consistency with Action Agenda. Utilizes existing Science Panel and sub committees



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Watershed Projects & Actions:

Direct awards to LIOs to fund NTAs. LIOs prioritize projects and actions based on an annual allocation. Review for consistency with Action Agenda and EPA/PSP LC criteria.

Allocation will include funding for LIO capacity.

Competition occurs within LIO.

Regional Science & Monitoring; Regionally-significant Projects:

Prioritized funding for regional science and monitoring and regionally significant projects based on input from the ISRB. PSP reviews for consistency with Action Agenda.

Competition occurs regionally.

Implementation Strategies:

Immediate completion is not necessary for this model but it does not preclude their development or their use as a mechanism to implement NEP. The 2016 Action Agenda could include the development of implementation strategies facilitated by PSP and developed with and fully supported by LIOs, tribes and others. When the strategies are adopted and approved by EPA, they will become a part of the CCMP.

70 % Watershed / 30 % Regional Funding Split