

Evaluation of Year 2000 Water Quality Grants and Loans Fund Distribution Method Pilot

Report for the Water Quality Financial Assistance Council

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Executive Summary

Origin and Purpose of Evaluation

This is an evaluation of the Department of Ecology's (Ecology) water quality grants and loans method used for State Fiscal Year 2000 (SFY 2000). That method consisted of project rating and ranking criteria, locally-derived water quality priorities, establishment of a standing policy advisory committee (Water Quality Financial Assistance Council), and related actions. This method was piloted in 1999 as recommended by the Financial Assistance Restructuring Committee (FARC).

The focus of this evaluation is to assess what types of projects faired well under the pilot rating and ranking criteria, how applicants and evaluators viewed the pilot, and how objective or subjective the rating and ranking criteria are. The purpose of this evaluation is to identify where the Ecology grant and loans distribution method can be improved for SFY 20001.

This evaluation offers conclusion, where appropriate, but does not make specific process change recommendations. These changes are being developed through the Financial Assistance Council and will be published as part of the FY 2001 application and guidance in early 2000.

Programmatic Evaluation of the Pilot

Have the Financial Assistance Restructuring Committee (FARC) recommendations been implemented? The pilot grants and loans process was designed to specifically implement the recommendations of the FARC. All but one of that committee's recommendations (rulemaking) has been entirely or partly implemented through this pilot. Some additional enhancements are needed to fully achieve the committee's recommendations to be a simple and user-friendly system and to improve the procedures for integrating local priorities into the points system. However, the most substantive elements of the FARC recommendations have been fully implemented. These include establishing specific criteria to rate and rank proposals, creating a standing Water Quality Financial Assistance Council, and integrating locally-derived water quality priorities into the state's rating and ranking process.

Has pilot achieved the FARC goals? Many of the FARC goals are perceptional-based and thus difficult to objectively evaluate. These include "highest priority environmental need," "long-term community sustainability," "support for the financial assistance program," "predictable and understandable," and "be perceived to be fairly administered by stakeholders." However, Ecology has designed and conducted the pilot under these philosophic principles and has attempted to meet the spirit and intent of these goals throughout its implementation.

Consequences of the Rating Criteria

How many projects were submitted by region of the state and was there an "equitable" geographic distribution? Is there a regional bias in the criteria? Overall, the amount funded was split 48% eastern Washington and 52% western Washington. A slightly greater percent of projects funded compared to project requests occurred for projects in eastern Washington (46.1% total amount requested compared with 48% of total amount funded). This evaluation concludes that there is no regional bias inherent in the rating and ranking criteria.

Did any type of project or aquatic system or resource rate better than others using the pilot criteria? Did the criteria result in the "highest environmental issue, need, or problem" being awarded? Fish/salmon projects and small communities projects accounted for eight of the top ten ranked projects. Additionally, about 95% of all small communities project proposals and over 80% of fish/salmon projects were funded. Therefore, this evaluation concludes fish/salmon and small communities projects rated better than other types of projects under the pilot criteria.

Conversely, education and planning projects accounted for five of the lowest ranked projects, with only one-half of the education projects being funded and all of those funded projects falling in the second lowest ranked 25% group. No total planning projects were in the funded category.

How many proposals were submitted to implement specific legislative priorities and how many were funded?

- Legislative Priority: Salmon Recovery Projects: 19 projects proposed, 80+% funded.
- Legislative Priority: Small Communities Projects: 21 projects proposed, 95% funded.

This evaluation concludes specific legislative priorities were achieved through the pilot.

What was the approximate split between "corrective and preventive" types of projects? 76 "corrective projects" (62%) and 46 "preventive projects" (38%) were proposed for funding. Of these, 63 (70%) "corrective projects" and 27 (30%) "preventive projects" were funded. This evaluation concludes that there is a bias in the criteria for corrective projects over preventive type of projects. This is based on the conclusion that a greater percent of corrective type of projects were funded as compared with the percent proposed.

Rating and Ranking Objectivity

Comparing various reviewers' scores for the same project, how much variability occurred within individual criteria? How much variability occurred when comparing reviewers' scores for different projects but for the same criteria? For all evaluations, the average degree of variability of evaluations was determined to be 20%. This means that overall, for any given question, one could expect a difference of up to 20% in the total number of points being scored by different evaluators. The lowest degree of variability was 0% (meaning no difference in scores for the same question by different evaluators). The highest was 36% variability in responses.

Questions were grouped as to "lower than average variability," "average variability," "greater than average variability," and "greatest variability." Questions scoring for lower than average variability accounted for 25% of total possible points. Questions scoring for average variability accounted 16% of total possible points. Questions scoring for greater than average variability accounted for 31% of total possible points. Questions scoring for the greatest variability accounted for 29% of total possible points. Overall, questions representing a majority of total possible points were subject to greater to greatest variability in application.

As a group, the State and Federal Mandates criterion was the most objective criterion, with 50% of its evaluations rating lower than average variability. The apparent least objective criterion was the Local Effort criterion, with 84% of its evaluations rating greater than average variability to greatest variability.

There are several possible explanations for the degree of variability: the question was highly subjective or the question was understood differently by applicant and/or among evaluators. Additionally, some of the questions were inherently variable in that they offered a range of points (e.g., 0 to 25 points). The value of this variability test is as a first screen to help focus on which questions should be retained, revised, consolidated, or deleted.

This evaluation concludes that numerous application questions should be reviewed and decisions made whether they be retained. In particular, questions scoring greater than average variability, should be reviewed to determine if they need to be deleted, revised for clarity, consolidated with other questions, and/or, where appropriate, their range of points be replaced with an "either/or" scoring mechanism (i.e., from 0 to 25 points to 0 or 25 points).

Integrating Locally-Derived Water Quality Priorities into the State's Rating and Ranking Process

Were locally developed priorities awarded points in the pilot? How many applications were awarded local prioritization points and what was the relative value of those points as part of the projects overall score? 34 statements of agreed priorities addressing 102 projects (83% of all proposed projects) were received. Of the 122 project proposals submitted for funding under the pilot, 100 (82%) were awarded local priorities points. Of the 100 projects being awarded local priority points, local priority points was less than 10% of the projects total points for 54 (54%) projects and more than 10% for 46 (46%) projects. The median percent of local priority points as expressed as percent of total points awarded is 8.7%. At the outset, local priority points were envisioned to account for up to a potential of 10% of total points available.

What effect did local prioritization points have on the final offer list? Five projects that were funded would have fallen below that cut-off while five projects that did not get grant funding would have been funded if local prioritization points were not included. This effect would have been much more profound had not the Legislature provided as much money as it did in the cycle.

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¹ Other than local prioritization points which were not part of the evaluation, but were added to each project score if eligible after the project was evaluated.

Of the five projects that would have been funded if no local points were assigned, each project would have moved up the following number of ranks: +6, +11, +8, +8, and +4. Of the five projects that would not have been funded if no local points were assigned, each project would have moved down the following number of ranks: -6, -24, -18, -17, and -18.

What were some of the problems encountered with local prioritization process? Many applicants and administrators reported several procedural uncertainties in the process. Some of these are:

- Many applicants reported it was time consuming, given the number of groups involved.
- It was not clear to applicants or administrators who was the lead for organizing the process and ensuring submittals
- It was difficult for applicants and administrators to determine just how many signatures should be received for the three other required groups.
- Some applicants reported it was very helpful to them to determine what the local priorities are.
- Some applicants reported it was a good opportunity to have discussions with their counterparts in neighboring communities.
- Submittals were inconsistent.
- Some applicants and administrators suggested that local priority process should allow established groups, such as watershed planning groups, to submit numerically ranked priorities.
- Applicants and administrators reported a desire for Ecology to settle on one geographic boundary county or water resource inventory area rather than keeping it optional.

This evaluation concludes that, notwithstanding some procedural difficulties that need to be addressed overall, the pilot was successful in integrating locally derived water quality priorities for the first time into the state's water quality funding rating and ranking process. This conclusion is based on the fact that 82% of all projects were awarded local priority points and that those points directly resulted in some projects being funded that would not have been otherwise. The focus for the next funding cycle should be on addressing the procedural difficulties relating to refinements to required groups and number of signatures needed, role of established coordinated bodies, defining the geographic area, and standardizing expected submittals.

Achievement of Transparency and User-Friendly Goals

Was the overall pilot process fair? Through a survey, about half of the applicants reported the pilot process to be average to very good, and about 43% reported it to be fair to poor.

Was the application clear? Over 70% of applicants responding to the survey reported the application form and application guidance to be helpful to very helpful and a majority thought the application workshops were helpful to very helpful. However, 42% of the applicants thought the clarity of the application questions was fair to poor. Some applicants reported that the application had too many redundant and irrelevant questions.

Was Ecology helpful? 63% of respondents reported Ecology's assistance to be helpful to very helpful. Telephone assistance was identified as the most helpful. Direct mailings and Ecology's homepage were also identified by a majority as being helpful to very helpful.

Was there an overall net increase in administrative costs? The pilot is estimated to have cost about \$108,000. However, it cannot be determined if there is an increase in administrative costs over previous fund distribution methods because there is not a firm, directly comparable set of cost estimates available and because many costs incurred in the pilot would have been incurred using previous funding methods.

This evaluation concludes that the application form should be reviewed for the purpose of clarification and simplification and that the application workshops should continue.

This evaluation concludes that there are components of the pilot that can be and should be streamlined and costs reduced. Foremost among these is the number of reviewers and total number of reviews.

I. Background, Purpose and Organization of Report

This is an evaluation of the Department of Ecology's (Ecology) water quality grants and loans method used for State Fiscal Year 2000 proposal evaluations. This method is a pilot recommended by the Financial Assistance Restructuring Committee (FARC) to Ecology in November 1998. The FARC was comprised of a wide range of water quality financial assistance clients and interests. Grants and loans subject to the FARC's recommendations are those under the Centennial Clean Water Fund, State Revolving Fund, and Section 319 of the federal Clean Water Act. The FARC's recommendations were published in Ecology Publication #98-36WQ, Water Quality Financial Assistance, Fund Distribution Method Report of the Financial Assistance Restructuring Committee.

The purpose of this evaluation is to identify where the grants and loans distribution method can be improved for the SFY 2001 funding cycle.

The Water Quality Financial Assistance Council has participated and guided the department in the evaluation of the pilot.

This evaluation draws conclusions, where appropriate, on how well the pilot functioned and which of its components need enhancements. It does not include specific changes for the next funding cycle. However, these changes will be included in the application and guidance for FY2001 fund cycle and are scheduled to be available in early 2000.

This report is organized with the following sections:

- I. Background, Purpose and Organization of Report
- II. Programmatic Evaluation of Financial Assistance Restructuring Committee (FARC) Recommendations and Goals
- III. Consequences of Rating Criteria
- IV. Rating and Ranking Objectivity
- V. Integrating Locally-Derived Water Quality Priorities into the State's Rating and Ranking Process
- VI. Achievement of "Transparency" and "User Friendly" Goals
- VII. Costs of Pilot
- Appendix A. Survey of Applicants
- Appendix B. Survey of Evaluators
- Appendix C. Comparison of Applicants and Evaluators Surveys

Section II of this report gives a high level overview of what steps have been taken to implement the recommendations of the Financial Assistance Restructuring Committee as part of the FY2000 grants and loans pilot.

Sections III, IV, V, and VI get at the heart of the advisory committee changes to the funding system. A major component is the advent of evaluative criteria for rating proposals. Section III evaluates what type of geographic and what type of project biases may be in the criteria by looking at how different geographic areas did in getting funded projects and how different type of projects were favored and disfavored under the criteria. Section IV looks into the degree of variability of the questions to determine the objectivity and subjectivity of the questions. Section V assesses how the first-time application of point awards for locally-developed priorities functioned, how many applicants were awarded these points, and what effect they had on the final offer list. Section VI attempts to answer how applicants reviewed the pilot by including information received through a survey on perceptions of fairness and simplicity.

Section VII provides some costs of the pilot and points to where cost saving could occur in future enhancements to the grants and loans fund distribution method. Finally, at the end of this report, three appendices are attached that summarize survey information for applicants and evaluators and makes comparisons between the two.

II. Programmatic Evaluation of Financial Assistance Restructuring Committee (FARC) Recommendations and Goals

Introduction

This section provides a qualitative assessment of what has been accomplished in the pilot to implement the recommendations of the Financial Assistance Restructuring Committee and how well the pilot has achieved the goals of that committee.

Have the FARC Recommendations Been Implemented?

FARC Recommendation 1:

Keep the Process Simple and User-Friendly. Some of the actions Ecology took to implement this recommendation are:

- Development and adoption of a single set of evaluation criteria and points and guidance that were made available in advance to applicants and that were used by evaluators.
- Posting the application and criteria on the internet.
- Posting applicant names on the internet for information sharing among applicants.
- Hosting several workshops statewide for applicants and evaluators.

To help gauge whether the process is considered simple and user-friendly, Ecology conducted a survey aimed to solicit feedback on the process. Section VI of this report summarizes the results of that survey as they relate to simplicity and assistance. The complete results of the survey are included in Appendix A of this report.

Despite these efforts to make the grants and loans selection process simple and user-friendly, it is clear from applicant and evaluator questions and concerns during the application period that at least certain aspects of the pilot were not simple or user-friendly. In particular, Ecology received numerous questions and concerns about unclear application questions and about how to conduct the local prioritization process.

FARC Recommendation 2:

Adopt Funding Method into Regulation. The portions of the fund distribution to be adopted into regulation should be at a high-level and are the overall structure, major policies, the fund method process, and associated administrative elements.

This recommendation has not been implemented to await the results of this evaluation of the pilot. Ecology could have begun rulemaking concurrently with the pilot but elected to conserve limited staff resources rather than stretch resources thin between the pilot, its evaluation, and rulemaking.

FARC Recommendations 3 and 4:

Establish Evaluative Criteria and Rating Points System, weighted to reflect current water quality priorities with periodic adjustments, as needed, to adjust for changing priorities. Specific weights (percent of total points) for the criteria are water quality problem or need= 32%, proposed solution= 32%, state/federal mandates= 14%, local efforts= 12%, and local prioritization= 10%. Review the criteria and weights with the Water Quality Financial Assistance Advisory. Ecology established a series of criteria and assigned associated points at the weightings recommended by the FARC. The criteria and associated weights are the subject of this current evaluation being conducted in concert with the Financial Assistance Council. With the completion of this evaluation, this recommendation is fully implemented. See Sections III and IV.

FARC Recommendation 5:

Implement recommendations in the report for the State Fiscal Year 2000 Funding Cycle as a pilot prior to rule adoption under the advice of the Water Quality Financial Assistance Advisory Council. This recommendation was fully implemented by Ecology. The current pilot was designed to be tested and evaluated for state fiscal year 2000 funding cycle prior to formal rulemaking.

FARC Recommendation 6:

Establish Water Quality Financial Assistance Advisory Council. This recommendation was fully implemented by Ecology with a few exceptions. These exceptions were not inviting representatives of business and industry or agriculture to serve as Council members. These are considered minor exceptions because business and industry are not eligible entities for water quality grants and loans and because at least some of agricultural interests are represented by Council members representing conservation and irrigation districts and the Conservation Commission.

The Council held its first meeting in December 1998 where it adopted its workplan for 1999. Primarily, in 1999 the Council is scheduled to oversee this evaluation of the pilot and to make recommendations on changes to the pilot to be implemented in the state fiscal year 2001 funding cycle. The Council meets approximately every six weeks. Members are on rotating terms of one or two years with new Council members added in January of each year. Table 1 gives the status of membership recommended by the FARC.

One other exception is that the original FARC recommendation was for two tiers of membership: full membership and *ex officio* membership. State and federal agency members were to be *ex officio* members only – serving as technical resources to the full members (non-agency) of the Council. In practice, these distinctions have been blurred. Additionally, Ecology has been chairing the Council (at Council request). The Financial Assistance Council should determine if further refinement or clarification of roles and responsibilities between full and *ex officio* members is needed in order to retain the autonomy envisioned by the FARC.

Table 1
Status of FARC Recommendations to Convene Council

GROUP RECOMMENDED BY FARC	INVITED?	COUNCIL MEMBER? HOW MANY?	IF NOT INVITED, WHY?
Full Council Membersh	ip		
Cities	Yes	Yes, 3 plus 1 association	
Counties	Yes	Yes, 3	
Tribes	Yes	Yes, 1 plus 2 associations	
Conservation Districts	Yes	Yes, 1	
Special Purpose Dist.	Yes	Yes, 2 plus 2 associations	
Environmental	Yes	Yes, 1	
Organizations			
Business and Industry	No	No	Not grant/loan eligible entity
Agriculture	No	No, other than districts	
Other groups as appropriate	No	No	None determined to be relevant
Ex Officio Council Men	nbership		
Department of Ecology (primary staffing responsibility for the Council);	Yes	Yes, 2 plus 1 staff	
Department of Health	Yes	Yes, 1	
Department of Community, Trade and Economic Development	Yes	Yes, 1	
Conservation Commission	Yes	Yes, 1	
Department of Natural Resources	Yes	Yes, 1	
Puget Sound Water Quality Action Team	Yes	Yes, 1	
Department of Transportation	Yes	No	
Interagency for Outdoor Recreation	Yes	Yes, 1	
Environmental Protection Agency	Yes	Yes, 1	
Natural Resource Conservation Service	Yes	Yes, 1	
Other agencies	Yes	Yes, 1 (WSU)	

FARC Recommendation 7:

Allow local input into funding priorities where local entities (at a minimum, this must include representatives of cities, counties, conservation districts, special purpose districts and tribes) rank project priorities within their areas. This recommendation was fully implemented. Specifically, points were available for projects submitted in a numeric rank order by local entities. The requirement for obtaining special purpose district signatures was limited to sewer and water districts so as to target districts most directly related to water quality management (as compared to library districts, for instance).

Although this recommendation was fully implemented, applicants reported that it was not without a great deal of difficulty in getting the required signatures. Only a handful clearly contained the signatures of all of the entities in each of the required groups within a local area. Because this process was new to both Ecology and applicants and because its intent was to get local groups together to prioritize, Ecology decided to award at least some points to projects that were submitted with signatures of at least two required organizations. Ecology made this decision with the Water Quality Financial Assistance Council's advice. See Section V of this report for a more detained evaluation of the local prioritization process.

Did the Pilot Achieve the FARC Goals?

The following summarizes how well the pilot met the committee's goals.

- Provide funding based on the highest priority environmental need, while considering other social and economic needs. The "highest priority environmental need" is both scientific and subjective. Other factors, such as local prioritization and legislative mandates, influence the funding results of the pilot. Therefore, it cannot be stated outright that the pilot resulted in funding based on the highest priority environmental need. Generally, small community projects, fish projects, best management practices implementation in agricultural areas, and monitoring and data collection type projects scored highest under the criteria used in the pilot. Conversely, planning and education type projects tend to fare less well. See Sections III and IV, consequences of criteria and weights for more detail.
- Result in no net increase of administration costs. The pilot carried significant costs associated with multiple reviewers conducting multiple reviews. It is estimated that the pilot cost about \$108,000. The majority of that cost was in the review of applications. Other costs were incurred in criteria development, staff training, and costs of supporting the Financial Assistance Council. Similar cost centers (e.g., application reviews, staff training, and guidance development) were present in previous funding methods used. In addition, previous methods included a significant amount of managerial time in deriving statewide priorities through the "equal status piles" method. No cost estimates are available of the previous methods for conducting the financial assistance function, however, so it cannot be determined whether the pilot resulted in a net increase of administration. Nonetheless, a significant amount of time was spent in reviews of the proposals, which can and should be reduced. See Section VII.

- **Be a simple system.** In a survey (see Appendix A) conducted of applicants after the pilot, overall, about 40% of the applicants rated the pilot good to very good. However, only 20% reported that the clarity of the application questions was good to very good. Conversely, the application form was rated to be helpful to very helpful by 74% of the respondents and the application guideline was similarly rated by 79% of respondents. This evaluation concludes that the application questions need to be improved while retaining the user-friendly aspects of the form itself and its guidelines. Section VI and Appendix A.
- Allow for coordination of other funding sources, such as watershed planning grants. The pilot allows for coordination with other fund sources insofar as money can be "streamed" from various funds under a single application. In addition, the establishment of the Financial Assistance Council has enabled coordination through information sharing. For example, the Council was briefed on the Local Toxics Account and the Watershed Planning Grants fund sources during the pilot phase. Importantly, the Council also has assisted in the development of a new funding procedure for water quality penalty funds that are now available for restoration projects under the Coastal Protection Fund.
- Facilitate and streamline getting money out to projects which are ready to proceed. In concert with the implementation of the pilot, Ecology adopted regulations defining readiness to proceed. This requirement made several project proposals ineligible, thus freeing up money to go to projects that were ready.
- Support federal, state, tribal, and local geographic initiatives. The pilot supports the implementation of these initiatives. As indicated previously, however, planning type of projects did not fare well under the pilot.
- Strive to develop long-term community sustainability through partnerships and leveraging. This goal was not assessed in the evaluation.
- **Result in support for the financial assistance program.** This is a longer-term objective that was not assessed in the evaluation.
- Be predictable and understandable. Distributing the same application guidance in advance
 to applicants and reviewers and explaining the specific points available for the criteria aid in
 achieving this goal.
- Strive to fund a balance of cleanup and prevention projects. The pilot resulted in about 70% of funded projects being more "corrective" or cleanup type of projects.
- **Be perceived to be fairly administered by stakeholders.** Overall, 57% of the applicants responding to a survey after the pilot thought fairness of the pilot process was average to very good. 25% though it was fair to poor.
- Allow stakeholders' input into prioritization process. The pilot was the first time Ecology allowed for input into the prioritization process. The vast majority of applications were assigned local prioritization points.

III. Consequences of Rating Criteria

How Many Projects Were Submitted by Region of the State, and Was There an "Equitable" Geographic Distribution?

Total Requests by region

	Projects	Grants	Loans	Total
Statewide	1	\$ 182,053	\$ -	\$ 182,053
CRO	27	\$ 8,119,983	\$ 11,372,000	\$ 19,491,983
ERO	27	\$ 6,171,739	\$ 3,808,345	\$ 9,980,084
NWRO	46	\$ 8,456,398	\$ 11,764,757	\$ 20,221,155
SWRO	32	\$ 4,847,761	\$ 9,165,150	\$ 14,012,911
Total Requests	133	\$ 27,777,934	\$ 36,110,252	\$63,888,186

Of the 133 projects proposed, 11 were disqualified because they were not eligible for funding under the water quality grants and loans program. These projects were not evaluated through the rating and ranking process. The total amount of funds requested from these non-eligible projects was \$6,284,271 (grants) and \$9,717,750 (loans) for a total of \$16,002,021. Therefore, Ecology evaluated the following:

Eligible requests by region

•	Projects	Grants	Loans	Total
Statewide	1	\$ 182,053	\$ -	\$ 182,053
CRO	26	\$ 6,119,983	\$ 6,323,000	\$ 12,442,983
ERO	24	\$ 4,733,218	\$ 3,178,345	\$ 7,911,563
NWRO	40	\$ 5,610,648	\$ 8,526,007	\$ 14,136,655
SWRO	31	\$ 4,847,761	\$ 8,365,150	\$ 13,212,911
Total Eligible	122	\$ 21,493,663	\$ 26,392,502	\$47,886,165
Requests				
Ineligible projects totals	11	\$ 6,284,271	\$ 9,717,750	\$ 16,002,021

Funded projects by region

Projects Grants Total Loans Statewide 0 CRO 22 \$6,318,133 \$4,108,000 \$10,426,133 \$3,047,581 14 \$4,274,095 \$ 7,321,676 **ERO NWRO** 33 \$5,321,523 \$7,791,007 \$13,112,530 **SWRO** 21 \$4,232,453 \$1,790,150 \$6,022,603 **Total Projects Funded**² 90 \$18,919,690 \$17,963,252 \$36,882,942

² All of the above tables give only the number and amount of projects that were competitively considered in the grants and loans funding pilot. Projects funded outside this competitive pilot but not included above are the extended grant payment agreements with King County-Metro (\$12,500,000) and Spokane City/County (\$5,000,000), legislative proviso for the City of Connell (\$3,600,000), and an increase to an existing SRF loan to Mason County (\$6,559,688).

Is There a Regional Bias in the Criteria?

Considering the following table, which shows funds, requested and offered geographically by Ecology regional office³ and split between western and eastern Washington. Overall, the amount funded was split 48% eastern Washington and 52% western Washington. A slightly greater percent of projects funded compared to project requests occurred for projects in eastern Washington (46.1% total amount requested compared with 48% of total amount funded).

Geographic Distribution of Projects Requested and Funded								
Requested (total requests)				Funded				
Region	# Projects	% Total	\$m	% Total	# Projects	% Total	\$m	% Total
CRO	27	20.3%	\$19.5	30.5%	22	24.4%	\$10.4	28.2%
ERO	27	20.3%	\$10.0	15.6%	14	15.6%	\$7.3	19.8%
NWRO	46	34.6%	\$20.2	31.6%	33	36.7%	\$13.1	35.5%
SWRO	32	24.1%	\$14.0	21.9%	21	23.3%	\$6.0	16.3%
E. WA	54	40.6%	\$29.5	46.1%	36	40.0%	\$17.7	48.0%
W. WA	78	58.7%	\$34.2	53.5%	54	60.0%	\$19.1	52.0%

This evaluation concludes that there is no regional bias inherent in the pilot criteria.

Did Any Type of Project or Aquatic System or Resource Rate Better Than Others Using the Pilot Criteria? Did the Criteria Result in the "Highest Environmental Issue, Need or Problem" Being Awarded?

The projects were sorted by type. In conducting the sort, several things must be kept in mind:

- The type of project was established from the project summaries. Some of these are very abbreviated and may not completely describe the specific project or its objective. In these cases, the type of project established is that which best addresses the summary description.
- Several of the types of projects could be included in more than one category. For example, many projects have a data collection component, while their primary purpose may be as education or best management practices implementation. If, through the project summary, it appeared that the grant or loan requested would be spent in large part on the data portions, it was established as a data collection, analysis or management project.

The 122 eligible projects can also be categorized in ranked groups, from the highest ranking to the lowest. The following summarizes these groups. The top 10 ranked and the bottom 10 ranked projects are:

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³ CRO: Central Regional Office, Yakima. ERO: Eastern Regional Office, Spokane. NWRO: Northwest Regional Office, Bellevue. SWRO: Southwest Regional Office, Lacey. W. WA: Western Washington. E. WA: Eastern Washington.

Top 10 Ranked Projects, by Type

RANK	PROJECT TYPE
1	Fish/Salmon/Shellfish Project
2	Fish/Salmon/Shellfish Project
3	Fish/Salmon/Shellfish Project
4	Fish/Salmon/Shellfish Project
5	Small Communities Project
6	Small Communities Project
7	Fish/Salmon/Shellfish Project
8	Fish/Salmon/Shellfish Project
9	BMP Implementation Project
10	BMP Implementation Project

Bottom 10 Ranked Projects, by Type

RANK	PROJECT TYPE
112	Monitoring Project
113	Planning Project
114	Monitoring Project
115	Planning Project
116	Planning Project
117	Data Collection Project
118	Education Project
119	Education Project
120	Data Collection Project
121	Data Collection Project
122	Fish Project

The overall list of eligible proposals can also be categorized into four groups:

- Top 30 Ranked Projects (1-30)
 2nd highest 30 (31-60)
 2nd lowest 30 (61-90)

- Bottom 31 Ranked Projects (92-122)

Top 30 Ranked Projects

- Monitoring Projects = 7
- Fish Projects = 6
- BMP Projects = 4
- Small Community Projects = 3
- Data Collection Projects = 3
- CSO Projects = 3
- Education Projects = 2
- Treatment Plant Projects⁴ = 1
- Stormwater = 1

Projects Ranked 31-60

- Small Community Projects = 11
- Data Collection Projects = 5
- Fish Projects = 5
- BMP Projects = 3
- Monitoring Projects = 2
- Stormwater Projects = 1
- Septic Projects = 1
- Treatment Plant Projects = 1
- Ground Water Project = 1

Projects Ranked 61-90

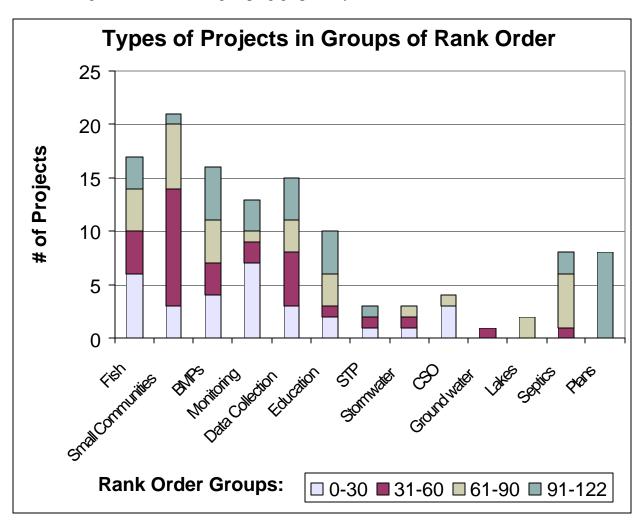
- Small Community Projects = 6
- Septic Projects = 5
- BMP Projects = 4
- Fish Projects = 4
- Data Collection Projects = 3
- Education Projects = 3
- Lakes Projects = 2
- Monitoring Projects = 1
- CSO Projects = 1
- Stormwater Projects = 1

Bottom 31 Ranked Projects (91-122)

- Plans = 8
- BMP Projects = 5
- Education Projects = 4
- Data Collection Projects = 4
- Fish Projects = 3
- Monitoring Projects = 3
- Septic Projects = 2
- Small Community Projects = 1
- Treatment Plant Projects = 1

⁴ "Treatment Plant Projects" as used in this report means non-small community wastewater treatment plants. Many of the "Small Community Projects" are also treatment plants, but are grouped here under the label small community project.

The following chart shows these grouping graphically.



Project Types Favored/Disfavored

- Fish projects fairly equally distributed among all 4 ranked groups. 80+% funded
- Small community projects mostly in 2nd highest ranked group. 95% funded
- Monitoring projects largest # in top ranked group. 75% funded
- BMP projects fairly equally distributed among all 4 ranked groups. 70% funded
- Data collection projects mostly in highest and 2nd highest ranked groups. 75% funded
- Education projects. 50% funded, 50% not funded with funded projects in 2nd lowest ranked group
- Plan projects. None funded
- Conclusions:
 - Criteria favors small communities (#1), fish (#2), monitoring and/or data collection (#3), BMPs (#4)
 - Criteria disfavors education and planning projects

This evaluation concludes fish/salmon and small communities projects rated better than other types of projects and that education and planning types of projects faired less well under the pilot criteria.

How Many Proposals Were Submitted to Implement Specific Legislative Priorities and How Many Were Funded?

The 1999 Legislature established two priorities for the SFY2000 grant and loan cycle. Those priorities and results of the pilot are summarized below:

- **Legislative Priority: Salmon Recovery Projects:** 19 projects proposed, 80+% funded.
- Legislative Priority: Small Communities Projects: 21 projects proposed, 95% funded.

Overall, total of 40 projects proposed (33% of all eligible projects) and 36 projects funded (40% of funded projects).

This evaluation concludes specific legislative priorities were achieved through the pilot.

What Was the Approximate Split Between "Corrective and Preventive" Types of Projects?

Most projects have elements of both preventive and corrective objectives. However, generally, they can be characterized according to their primary function as follows:

Evaluated Projects

Primarily "Preventive" Projects

•	Data collection, analysis, management	=	15 projects
•	Monitoring	=	13 projects
•	Education	=	9 projects
•	Planning	=	8 projects
•	Ground water	=	1 project

Total Preventive Projects = 46 projects (38% of total)

Primarily "Corrective" Projects

•	Small communities	=	21 projects
•	Salmon/Fish/Shellfish	=	18 projects
•	BMP implementation	=	17 projects
•	Septic Systems	=	8 projects
•	Combine Sewer Overflow	=	4 projects
•	Treatment Plants	=	3 projects
•	Stormwater	=	3 projects
•	Lakes	=	2 projects
T	4-1 C D i 4-		76 . (60)

Total Corrective Projects = 76 projects (62% of total)

Under this categorization, almost two-thirds of the projects evaluated are corrective type of projects.

Funded Projects

Primarily "Preventive" Projects

•	Data collection, analysis, management	=	11 projects
•	Monitoring	=	10 projects
•	Education	=	5 projects
•	Planning	=	0 projects
•	Ground water	=	1 project

Total Preventive Projects = 27 projects (30% of total)

Primarily "Corrective" Projects

•	Small communities	=	20 projects
•	Salmon/Fish/Shellfish	=	14 projects
•	BMP implementation	=	12 projects
•	Septic Systems	=	6 projects
•	Combine Sewer Overflow	=	4 projects
•	Treatment Plants	=	2 projects
•	Stormwater	=	3 projects
•	Lakes	=	2 projects

Total Corrective Projects = 63 projects (70% of total)

Under this categorization, about 70% of the projects funded are corrective type of projects. Even though the categorization of projects into project type requires some interpretation and subjectivity, this suggests that there is not an "approximate split in 'corrective and preventive' types of projects" under the pilot rating system.

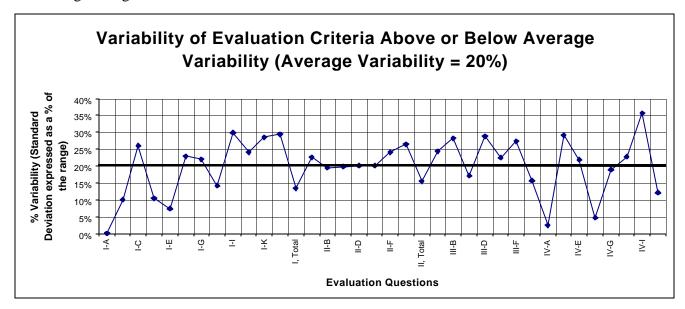
This evaluation concludes that there is a bias in the criteria for corrective projects over preventive type of projects.

IV. Rating and Ranking Objectivity

Comparing Various Reviewers' Scores for the Same Project, How Much Variability Occurred Within Individual Criteria?

How Much Variability Occurred When Comparing Reviewers' Scores for Different Projects But for the Same Criteria?

The following are questions in the FY2000 application responses, which were evaluated and assigned points by evaluators. The responses were tallied for all 122 eligible applications. In the pilot, four to six evaluators evaluated each eligible proposal. The scores for all evaluations were tabulated. For each application and each question, the maximum, minimum and range of points possible were determined. Additionally, the statistical mean and standard deviation were calculated. The "mean of the mean" of all question scores and the mean of the standard deviation of all questions were also calculated. Finally, the degree of variability of each question was calculated by determining the deviation as a percent of the range of possible points for each question. For all responses, the average degree of variability was determined to be 20%. The following table gives these values.



QUESTIONS SCORING FOR LOWER THAN AVERAGE VARIABILITY

0% Variability: Question IA.

Is the general public exposed to unrestricted contact with inadequately treated wastewater in a widespread area of human habitation (such as surfacing septage throughout a town, city, county, tribal reservation, etc.), AND has the local health department documented this condition? (0 or 320 points).

2% Variability: Combined Questions IVA, B, and C.

Has a Public Health Emergency been declared by State Department of Health? Has a Severe Public Health Hazard been declared by State Department of Health? Has a Severe Public Health Hazard been declared by the local county health department? (0-40 points).

5% Variability: Question IV.F.

Does the project serves an "Economically Distressed" area? (0 or 20 points)

7% Variability: Question I.E.

Does the problem or threat affect primary contact recreation (swimming, water skiing, etc)? (0-20 points).

10% Variability. Question I.B.

Does the project address a domestic water supply that is threatened or degraded? (0-50 points)

11% Variability. Question I.D.

Does the problem or threat adversely affect a shellfish harvesting area? (0-50 points)

14% Variability. Question I.H.

Is agricultural or industrial water supplies affected by the problem? (0-15 points)

17% Variability. Question III.C.

For totally preventive projects, is the applicant presently in compliance with all current permit requirements or water quality standards in the project area? (0 or 20 points)

19% Variability. Question IV.G.

Does the project proposal address an urgent water quality problem or a compliance action (such as court order, enforcement order, local emergency)? (0 or 10 points)

QUESTIONS SCORING FOR AVERAGE VARIABILITY

20% Variability. Question II.B. Describe past and present local efforts to protect and improve water quality or preventive measures regarding the water quality concerns that are to be addressed in the proposed project (such as other water quality projects undertaken in the area, formation of Shellfish Protection Districts, Lake Management Districts, Ground Water Special Protection Areas, commitment of local share, volunteer efforts, participation in the Small Town Environment Program, donated equipment or material, etc). (**0-30 points**)

20% Variability. Question II. C.

Describe and, as needed, document with letters of approval, etc. the completion of necessary project pre-requisites (such as Ecology approval for previous steps [facilities plans, watershed plans, design, etc] or project phases, land acquisition, easements, environmental permits, interlocal agreements, staffing plans or procurement process, state agency and local jurisdiction approvals. (0, 15 or 25 points)

20% Variability. Question II.D.

Have specific steps been taken to ensure that the project is completed, such as establishing or adjusting user fees, or drafting or adopting ordinances, etc? (0-10 points)

20% Variability. Question II.E.

Describe the relationship of the proposed project to <u>specific</u> recommendations and plan priorities identified in comprehensive planning effort(s) that have been completed or updated in the last five years. Assignment of points according to the bulleted criteria below would generally be in 3-5 point increments (to the maximum allowable points) according to the specific relationship to recommendations in the plans, the priority of the problem identified, the number of plans addressing the problem, and the degree the proposed project addresses implementation of the plan(s). (0-75 points)

QUESTIONS SCORING FOR GREATER THAN AVERAGE VARIABILITY

22% Variability. Question I.G.

Is wildlife habitat not described above adversely affected by the problem? (0-10 points)

22% Variability. Question III.E.

Describe the security of the funding from other sources for the non-Ecology share. (0-20 points)

22% Variability. Question IV.E.

Does the project address an EPA/Ecology TMDL or equivalent water quality cleanup plan? (0 or 20 points)

23% Variability. Question I.F.

Is there aesthetic impairment (smell, color, visual aspect, etc) due to the water quality problem? (0-15 points)

23% Variability. Question II.A.

Describe the methodologies or technologies you propose to use to address the water quality problem or need, outline proposed tasks, provide a budget broken out by task, and describe the proposed project management team. Also, predict the likelihood of success and explain the prediction, and the cost effectiveness of the proposed project. (0-100 points)

23% Variability. Question IV.H.

Does the project proposal address a legislative mandate for water quality funding? (0 or 20 points)

24% Variability. Question I.J.

Is the affected water body identified on the current 303(d) list as not meeting water quality standards, or are ground water standards being violated for one or more parameters? (Tributaries to 303(d) listed waters can be considered if the source of the violation is from the problem to be addressed). (0-25 points)

24% Variability. Question II.F.

Describe the proposed evaluation approach to determine project effectiveness (Water quality monitoring before, during, and after implementation of the project and long-term commitment to monitoring of effectiveness). (0-40 points)

24% Variability. Question III.A.

Describe the specific steps that will be taken to ensure that, for planning projects, the plan will be implemented or the facility proposed in the plan will be constructed (specific implementation projects of a locally-approved plan (e.g. facilities design or construction of a project according to facilities planning) would automatically be assigned 25 points). For riparian, wetland, or lake restoration projects, adequate guarantees that restoration measures will be maintained, best management practices will be continued, ordinances have been or will be passed or enforcement actions will be taken, etc. (0-25 points)

QUESTIONS SCORING FOR GREATEST VARIABILITY

26% Variability. Question I.C.

Does the project address fish habitats? (0-50 points)

27% Variability. Question II.G.

Describe indirect measures of success such as behavior or activity changes, public awareness, project visibility, etc. (0-40 points)

27% Variability. Question III.F.

Describe how the ongoing needs of the project (continued monitoring, operation and maintenance, replacement, etc.) will be financed. (0-20 points)

28% Variability. Question III.B.

Describe how prerequisite requirements, such as SEPA, the Growth Management Act, and Hydraulic Project Approval, etc., have been or will be achieved (0 to 20 points)

29% Variability. Question I.K.

Does the project address prevention of degradation of water quality parameters that currently meet water quality standards? (0-25 points)

29% Variability. Question I.L.

Are multiple water bodies affected for the same parameter(s)? (0-25 points)

29% Variability. Question III.D.

Describe the management strategy that has been developed and/or implemented to address time constraints involving the proposed project (such as in-stream flows, compliance schedules, litigation requirements). (0-15 points)

29% Variability. Question IV.D.

Does the project address Endangered Species Act Requirements? (0 or 20 points)

30% Variability. Question I.I.

Please provide any additional information related to the overall water quality impairment (especially factors <u>not</u> described above) if the water quality need/problem is not addressed. (0-35 **points**).

36% Variability. Question IV.I.

Describe whether or not the applicant can pay for the project if financial assistance is not provided by Ecology. Applicants may wish to include the cost to local citizens with and without Ecology's financial assistance. (0-10 points)

SUMMARY

- Questions scoring for lower than average variability
 - Accounts for 225 points total (25% of total possible points)
 - None from "proposed solution" criterion
- Questions scoring for average variability
 - Accounts for 140 points total (16% of total possible points)
 - All from "proposed solution" criterion
- Questions scoring for greater than average variability
 - Accounts for 275 points (31% of total possible points)
 - Question IIA is potential 100 points
- Questions scoring for greatest variability
 - Accounts for 260 points (29% of total possible points)
 - 135 points from water quality problem/need criterion
 - 55 points from local effort criterion

% of Points by Criteria Within Groups of Lower, Average, Greater, and Greatest Variability								
			EFFORT					
Lower	60%	0%	9%	31%	100%			
Average	0%	100%	0%	0%	100%			
Greater	18%	51%	16%	15%	100%			
Greatest	52%	15%	21%	12%	100%			

% of Points by Groups of Lower, Average, Greater, and Greatest Variability Within Criteria										
	Lower	Average	Greater	Greatest						
WQ	42%	0%	16%	42%	100%					
SOLUTION	0%	44%	44%	13%	100%					
LOCAL	17%	0%	38%	46%	100%					
EFFORT										
MANDATES	50%	0%	29%	21%	100%					

60% of the points scoring lower than average variability were in the water quality criterion. However, that same criterion also accounted for 52% of the points in the greatest variability group. All of the average variability questions were in the Proposed Solution criterion.

For all evaluations, the average degree of variability of evaluations was determined to be 20%. This means that overall, for any given question, one could expect a difference of up to 20% in the total number of points being scored by different evaluators. The lowest degree of variability was 0%. The highest was 39% variability in responses. Questions were group as to "lower than average variability;" "average variability;" greater than average variability;" and "greatest variability." Questions scoring for lower than average variability accounted for 25% of total possible points. Questions scoring for average variability accounted 16% of total possible points. Questions scoring for greater than average variability accounted for 31% of total possible points. Questions scoring for the greatest variability accounted for 29% of total possible points. Overall, questions representing a majority of total possible points (other than local prioritization points which were not part of the evaluation but were added to each project score if eligible after the project was evaluated) were subject to greater to greatest variability in application.

As a group, the State and Federal Mandates criterion was the most objective criterion, with 50% of its evaluations rating lower than average variability. Additionally, 31% the total points in the lower than average variability were State and Federal Mandates criterion points. The apparent least objective criterion was the Local Effort criterion, with 84% of its evaluations rating greater than average variability to greatest variability.

The specific questions and their degree of variability are listed below in order of the most consistently (i.e., least variable responses, or most objective) questions to the least consistent (i.e., most variable responses, or most subjective).

There are several possible explanations for the degree of variability: the question was highly subjective or the question was understood differently by applicant and/or among evaluators. Additionally, some of the questions were inherently variable in that they offered a range of points (e.g., 0-25 points). The value of this variability test is a first screen to help focus on which questions should be retained, revised, consolidated, or deleted.

This evaluation concludes that numerous application questions should be reviewed and decisions made whether they be retained. In particular, questions scoring greater than average variability, should be reviewed to determine if they need to be deleted, revised for clarity, consolidated with other questions, and/or, where appropriate, their range of points be replaced with an "either/or" scoring mechanism (i.e., from 0 to 25 points to 0 or 25 points).

V. Integrating Locally-Derived Water Quality Priorities into the State's Rating and Ranking Process

Introduction

Perhaps the most challenging aspect of the pilot was the inclusion of up to a potential 10% of the total points to be awarded for projects locally prioritized. The following summarizes guidance given at the beginning of the pilot and steps taken to implement this component of the pilot.

There was minimum written guidance on the local prioritization component of the pilot. Applicants were instructed that to be eligible for these points, "the following must occur:

- 1. The proposed project(s) must be assigned a numeric priority number (e.g., 1, 2, 3, etc.);
- 2. Representatives of the following required organizations, at a minimum, within the project proposal area [defined as either a county or a water resource inventory area, at the local option] must submit in writing a signed statement of agreed priority [an example was attached] that they agree or do not object to the assigned numeric priority number for the project:
 - Cities ['any and all incorporated city, town or municipal corporation within the project proposal area'];
 - Counties ['all counties within the project proposal area'];
 - Conservation Districts ['any and all organized and operating conservation districts within the project proposal area'];
 - Special Purpose Districts ['any and all organized and operating sewer or water districts authorized under state law to provide water quality or wastewater services within the project proposal area']; and
 - Tribes ['any and all tribes with reservations within the project proposal area and the tribe with fishing rights nearest the project proposal'].
- 3. Only one project per proposal area shall be given a unique ranked number (i.e., only one number 1 prioritized project, only one number 2 prioritized project, etc.) regardless of the number of projects proposed or regardless of the entity proposing the projects. If more that one project within a project proposal area is submitted with the same ranked number, none will receive the bonus points."

Applicants were given until April 16, 1999, to turn in statements of agreed priority. This was about six weeks after the close of the application period. Ecology reserved the ability to consider awarding points to projects on a case by case basis if the project proponent "demonstrate[d] that reasonable and rigorous efforts were made to obtain all required signatures. Additionally, the proponent must demonstrate to Ecology, to the extent practical, that the lack of all signatures was due to unavailability, illness, or other events beyond the control of the proponent and not due to disagreement over the project(s) objectives for water quality improvement or protection or explicit numeric rating of the projects."

Steps Followed for Submittals

The following summarizes how statements of agreed priority were processed.

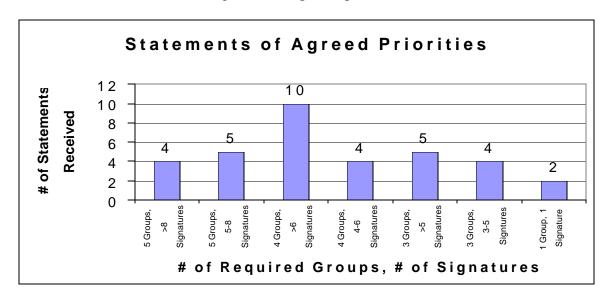
- 1. A mix of original signatures, facsimiles, individual concurrence signatures, faxes of individual concurrence signatures was received. Statements of agreed priority were different in appearance from each other.
- 2. Funding applications submitted by February 26, 1999, were reviewed and statements of agreed priority submitted with these applications were copied and utilized.
- 3. Submittals for a respective boundaries were collated and duplicate submittals were deleted. In the case where two documents were submitted by the same required organization, only the most recent submittal was used.
- 4. For each boundary, signatures were segregated by type and tallied.
- 5. Tribal information, including the name of the tribal representative, was provided to Ecology's intergovernmental affairs office to provide comments on the appropriate tribe or tribal representative.
- 6. Staff requested membership list from Association of Water and Sewer Districts to determine the appropriate district.
- 7. Submittals for each boundary were again reviewed and missing signatures by type were noted.

Were Locally-Developed Priorities Awarded Points in the Pilot?

34 statements of agreed priorities addressing over 100 projects (80+% of all proposed projects) were received. Following the April 16, 1999, submittal deadline for Statements of Agreed Priority, staff conducted an initial screening of all the Statements for completeness. It became readily apparent that few submittals strictly adhered to the original guidance. The majority had either not included all required groups or had not included all members of each required group.

Ecology staff consulted with the Financial Assistance Advisory Council on the issue. Members of the Council, in agreement with Ecology staff, recommended exercising leniency in assigning points. The Council recommended that a single signature from each of the five required groups

would be sufficient to receive full points. This meant that the top priority project in the area would receive 100 points, the second would receive 90, and so on. They also recommended that in situations where there was substantial compliance with the intent of the process, but one of the five required groups had no signatures, partial points should be given. Ecology followed this logic and decided that projects in local prioritization areas receiving partial points should not receive more points than the lowest priority projects in local prioritization areas receiving full points. Because there was a local prioritization area with eight projects prioritized (with the lowest receiving 30 local priority points), this meant that the maximum number of points assigned was 20 for projects in local prioritization areas getting partial points. Ecology again reviewed the submittals and assigned full or partial points.



How Many Applications Were Awarded Local Prioritization Points, and What Was the Relative Value of Those Points As Part of the Project Overall Score?

Of the 122 project proposals submitted for funding under the pilot, 100 (82%) were awarded local priorities points. Under the five major macro-criteria (water quality problem/need; proposed solution; state and federal mandates; local effort; and local priorities), the local priorities criterion was scheduled to be worth a maximum of 10% of the total possible available points. The following table shows that the actual relative portion, or percent, of local priorities was variable for total awarded points on a per project basis. That is, for some projects, local priorities points were only 1% of the total points awarded, while for others, it exceeded 25% of the projects total number of points. Of the 100 projects being awarded local priorities points, local priorities was less than 10% of the projects total points for 54 (54%) projects. 46 (46%) projects had local priorities being more than 10% of their total project scores. The median percent of local priorities points as expressed as percent of total points awarded is 8.7%.

of Projects with local priorities points: Local Priority Points % of total awarded points, by 100 pt cutoffs

	0%	1.0 -	2.1 -	5.1 -	10.1 -	15.1 -	20.1 -	25.1%	TOTAL
		2.0%	5.0%	10.0%	15.0%	20.0%	25.0%	+	
700 +	0	0	0	0	2	0	0	0	2
600 - 699	1	0	0	2	10	3	0	0	16
500 - 599	7	6	1	2	3	11	0	0	30
400 - 499	3	6	9	3	5	5	2	0	33
300 - 399	6	12	6	2	1	1	1	1	30
200 - 299	5	2	1	1	0	0	0	0	9
100 -199	0	0	1	0	0	0	0	1	2
TOTAL	22	26	18	10	21	20	3	2	122

- # Projects awarded Local Priorities Points: 100 (82% of total projects)
- # of Projects Awarded Local priorities Points where Local Points are < 10% of total points awarded: 54 (54%)
- # of Projects Awarded Local priorities Points where Local Points are > 10% of total points awarded: 46 (46%)
- Median # of Local Priorities Points as Expressed as % of Total Points Awarded: 8.7%

What Effect Did Local Prioritization Points Have on the Final Offer List?

The following table shows the effects of local prioritization points on the final offer list. From left, the columns are:

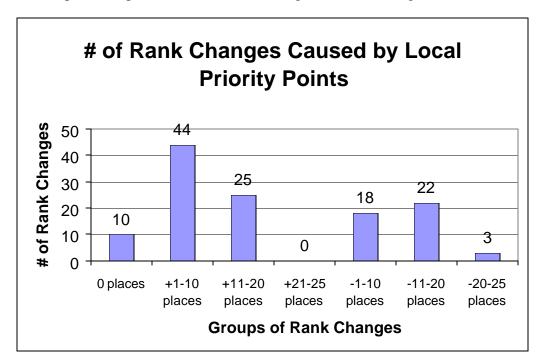
- 1. Actual overall project rank. This is the final rank order of the project list.
- 2. Overall project rank without local points. This is the rank order that would have resulted if no on received local prioritization points.
- 3. Number of different ranks with and without local points. This is the number of places, or ranks, that the project would have been either higher (positive number) or lower (negative number) without the local points.
- 4. Actual average rating. This is the actual final total average number of points the project was rated. It includes points assigned by Ecology reviewers and local priorities.
- 5. Local prioritization points. This is how many local prioritization points were assigned.
- 6. Average rating without local points. This is the number of points the project would have received if no one had been awarded local points.

On the actual offer list, grants ran out at actual priority number 85. Without local points, the cutoff would have been at actual priority number 86. However, five projects that were funded would have fallen below that cut-off while five projects that did not get grant funding would have been funded. This effect would have been much more profound had not the Legislature provided as much money in the cycle.

Of the five projects that would have been funded if no local points were assigned, each project would have move up the following number of ranks: +6, +11, +8, +8, and +4.

Of the five projects that would not have been funded if no local points were assigned, each project would have moved down the following number of ranks: -6, -24, -18, -17, and -18.

Overall, local priorities points caused the following number of changes to the final offer list:



	Effects of Local Prioritization Points on Final Ranking				
Actual Overall Project Rank	Overall Project Rank Without Local Points	# of Different Ranks with and without Local Points	Actual Average Rating	Local Prioritization Points*	Average Rating Without Local Points
1	1	0	754	90	664
3	2	1	695	60	635
2	3	-1	716	100	616
4	4	0	693	80	613
5	5	0	688	80	608
18	6	12	597	0	597
8	7	1	664	70	594
6	8	-2	683	100	583
7	9	-2	675	100	575
28	10	18	566	5	561
12	11	1	617	60	557
30	12	18	553	5	548
14	13	1	613	70	543
33	14	19	543	0	543
34	15	19	541	5	536
22	16	6	585	50	535
16	17	-1	603	70	533

	Effects of Local Prioritization Points on Final Ranking				
Actual Overall Project Rank	3	# of Different Ranks with and without Local Points	Actual Average Rating	Local Prioritization Points*	Average Rating Without Local Points
36	18	18	536	5	531
11	19	-8	620	90	530
9	20	-11	625	100	525
10	21	-11	624	100	524
39	22	17	528	5	523
17	23	-6	602	80	522
24	24	0	572	50	522
15	25	-10	608	90	518
41	26	15	518	0	518
13	27	-14	617	100	517
37	28	9	535	20	515
40	29	11	519	5	514
42	30	12	513	0	513
44	31	13	506	0	506
45	32	13	506	0	506
19	33	-14	595	90	505
46	34	12	503	0	503
29	35	-6	562	60	502
48	36	12	501	0	501
26	37	-11	569	70	499
20	38	-18	587	90	497
21	39	-18	586	90	496
25	40	-15	570	80	490
54	41	13	490	0	490
23	42	-19	573	90	483
55	43	12	488	20	468
27	44	-17	567	100	467
59	45	14	471	5	466
58	46	12	477	20	457
31	47	-16	551	100	451
32	48	-16	551	100	451
49	49	0	499	50	449
64	50	14	445	0	445
66	51	15	443	0	443
60	52	8	462	20	442
53	53	0	490	50	440
62	54	8	450	10	440
35	55	-20	537	100	437
69	56	13	441	5	436
38	57	-19	530	100	430
50	58	-8	499	70	429
70	59	11	437	10	427
65	60	5	444	20	424

Effects of Local Prioritization Points on Final Ranking					
Actual Overall Project Rank		# of Different Ranks with and without Local Points	Actual Average Rating	Local Prioritization Points*	Average Rating Without Local Points
63	61	2	449	30	419
52	62	-10	493	80	413
74	63	11	418	5	413
47	64	-17	502	90	412
43	65	-22	510	100	410
72	66	6	430	20	410
78	67	11	410	5	405
79	68	11	410	5	405
73	69	4	424	20	404
80	70	10	407	5	402
51	71	-20	499	100	399
56	72	-16	486	90	396
83	73	10	393	0	393
81	74	7	402	10	392
82	75	7	394	5	389
84	76	8	390	5	385
67	77	-10	443	60	383
68	78	-10	442	60	382
87	79	8	381	0	381
88	80	8	381	0	381
57	81	-24	478	100	378
86	82	4	383	10	373
77	83	-6	411	40	371
89	84	5	376	5	371
61	85	-24	462	100	362
76	86	-10	411	50	361
91	87	4	366	5	361
92	88	4	364	5	359
71	89	-18	436	80	356
93	90	3	360	5	355
90	91	-1	370	20	350
75	92	-17	417	70	347
94	93	1	357	10	347
96	94	2	352	5	347
101	95	6	346	0	346
100	96	4	347	5	342
99	97	2	350	10	340
104	98	6	337	5	332
98	99	-1	351	20	331
102	100	2	340	10	330
105	101	4	335	5	330
107	102	5	326	0	326
85	103	-18	385	60	325

	Effects of Local Prioritization Points on Final Ranking				
Actual Overall	Overall Project	# of Different Ranks	Actual Average	Local	Average
Project Rank		with and without	Rating	Prioritization	Rating
	Points	Local Points	_	Points*	Without Local
					Points
106	104	2	327	10	317
111	105	6	307	0	307
108	106	2	309	5	304
109	107	2	308	5	303
103	108	-5	338	40	298
110	109	1	307	10	297
112	110	2	284	0	284
113	111	2	282	0	282
115	112	3	277	0	277
116	113	3	276	0	276
114	114	0	280	5	275
95	115	-20	354	80	274
117	116	1	263	5	258
97	117	-20	351	100	251
119	118	1	247	0	247
118	119	-1	261	20	241
120	120	0	207	5	202
121	121	0	182	5	177
122	122	0	139	40	99

What Were Some of the Problems Encountered With Local Prioritization Process?

- Not clear on whom, within a boundary, was the lead for organizing the process and ensuring submittals. When a question arose on a submittal, contact was made with the individual submitting the document. It was often stated that the submittal was in response to a request and they did not know the reason why the submittal was needed.
- Outside of tribal information and conservation district information, difficult to determine just how many signatures should be received for the three other required groups.
- Inconsistency in applicant submittals. Some submitted all signatures (originals) together; some submitted copies of originals; some sent fax information and sent it as it was received by them; some had the required organizations send their information directly to Ecology.
- Inconsistency in what the submittal looked like. Some responses followed the example, some were in letterform, and some were in a fill-in-the-blank format.
- Several entities were shown in multiple boundaries. Arbitrarily used the boundary, which gave the project the highest priority.
- Which boundary to use. Rather than give a choice, it would have been much clearer to use either the WRIA boundary or the County boundary, but not both.
- Multiple signatures for some jurisdictions.
- Appropriateness of signatures. Difficult to verify just who should be signing.

- Disagreement with priority. In two cases, there were more than eight groups supporting a priority and one dissenter. The dissenter positions were not taken into account for FY 2000 (this funding cycle), but was this appropriate?
- The process was very difficult for many applicants.
- Some applicants reported that there were too many groups to coordinate with, therefore not worth the effort.
- Some applicants reported it was very helpful to them to determine what the local priorities are
- Some applicants reported it was a good opportunity to have discussions with our counterparts in neighboring communities Don't know why more of this doesn't happen.
- Some applicants reported it was a good process.
- Some applicants suggested that Ecology specify using a WRIA boundary or a County boundary for this effort but not both.

This evaluation concludes that, notwithstanding some procedural difficulties that need to be addressed, overall, the pilot was successful in integrating locally-derived water quality priorities for the first time into the state's water quality funding rating and ranking process. This conclusion is based on the fact that 82% of all projects were awarded local priority points and that those points directly resulted in some projects being funded that would not have been otherwise. The focus for the next funding cycle should be on addressing the procedural difficulties relating to refinements to required groups and number of signatures needed, role of established coordinated bodies, defining the geographic area, and standardizing expected submittals.

VI. Achievement of "Transparency" and "User Friendly" Goals

A major objective of the pilot was to achieve a grant and loan project evaluation system that was straightforward and understandable to applicants. To gauge the degree to which this objective was met, the applicant's survey asked a number of questions aimed at the "user friendliness" of the system. Following summarizes the survey responses.

Was the Pilot Process Fair?

- 43% of applicants thought the pilot process was fair to poor. 26% thought it to be average, while 23% thought it to be good to very good.
- Overall, 40% of respondents rated the pilot good to very good. 26% rated it average. 25% rated it fair to poor.

Was the Application Clear?

- 42% of the applicants thought the clarity of the application questions was fair to poor. 26% thought it was average. 20% thought the clarity was good to very good.
- The application form was rated to be helpful to very helpful by 74% of the respondents. 20% did not answer the question.
- The application guidelines were rated to be helpful to very helpful by 79% of the respondents. 14% did not answer the question.
- The application workshops were rated to be helpful to very helpful by 60% of the respondents. 29% did not answer the question.

Was Ecology Helpful?

- 69% of respondents requested Ecology assistance in preparing their application.
- 63% of respondents reported Ecology's assistance to be helpful to very helpful. 29% did not answer the question.
- Telephone assistance was rated to be helpful to very helpful by 71% of the respondents. 29% did not answer the question.
- Direct mailings were rated to be helpful to very helpful by 62% of the respondents. 31% did not answer the question.
- Ecology's homepage was rated to be helpful to very helpful by 60% of the respondents. 29% did not answer the question.

Summary of Applicants' Comments

- The application had way too many questions. Lots of redundant questions.
- Many questions on the application were irrelevant.
- Process is ok don't change it.
- Some contradictions in Ecology staff responses.

This evaluation concludes that the application form should be reviewed for the purpose of clarifying and simplification and that the application workshops should continue.

VII. Costs of Pilot

The pilot is estimated to have cost approximately \$108,000. This is based on the following cost centers:

- Number reviewers. 44. Number of reviews: 565. Average reviews per evaluator: 13.
- Length of time for reviews. Median is two hours.
- 565 X 2 =1130 hours (0.75 FTE). X \$80,000 = \$60,000.

FAC support: 3 meetings @ 6 hours per
 Work in between meetings
 = 40 hours

Reviewer Training

49 participants @ 6 hours per = 294 hours
 Preparation = 40 hours

Cost of Council.

6 meetings per year @ 6 hours per
 Preparation
 Clerical support
 Incidental costs
 = 36 hours
 = 240 hours
 = 24 hours
 = \$8,000

• Subtotal = 692 hours (0.5 FTE) X \$80,000 = \$40,000 + \$8,000 = \$48,000

• Cost of rulemaking: = 0 to date

■ TOTAL COSTS = = 0.75 FTE (rating, ranking)

• 0.5 FTE (program development, FAC)

■ 1.25 FTEs X \$80,000, + \$8,000 = \$108,000

Was There an Overall Net Increase in Administrative Costs?

There is not a firm cost estimate available for running previous grant and loan award programs. Additionally, many costs incurred in the pilot would have been incurred in previous funding methods. These include reviewer training, evaluation guidance development, applicant workshops, and managerial involvement. Under the "equal status pile" system used in FY99, significant additional management time was expended in compiling regional offices priorities into a statewide priority list. Hence, it is not possible to determine if there is a net increase or decrease in administrative costs.

This evaluation concludes that there are components of the pilot that can be and should be streamlined and costs reduced. Foremost among these is the number of reviewers and total number of reviews.

APPENDIX A. Survey of Applicants

Applicants Survey

Introduction

The applicants' survey was sent in the middle of June 1999 to approximately 130 applicants and about 70 individuals on the Financial Assistance Council's mail list. In total about 200 surveys were distributed and requested responses in one month.

Of the approximately 200 surveys sent, 35 responses were received. This is an 18% return rate.

Characteristics of Respondents

- 57% of respondents did not indicate which organization they represent. (This was an optional question).
- 20% of respondents indicated they represent conservation districts.
- 9% of respondents indicated they represent counties and 9% indicated they represent cities.
- 3% of respondents indicate they represent a sewer district and 3% indicate they represent a tribe.
- The large majority of respondents (91%) submitted an application during the pilot.

Reasons for Not Applying

• Of the 9% respondents who did not apply, none gave the reason as being the application time period, the Ecology reported limited amount of money, or new application process.

Evaluative Criteria

- 63% of respondents indicated that the criteria used were the right criteria.
- 60% of respondents indicated the water quality problem/need criterion should be weighted the same. 11% thought it should be weighted higher. 26% did not answer the question.
- 54% of respondents indication the proposed solution criterion should be weight the same. 14% thought it should be weighted higher. 26% did not answer the question.
- An equal number of respondents (54%) thought the state/federal mandate criterion should be weighted the same or higher or the same or lower, with most (34%) indicating the same. 23% did not answer the question.
- 60% of respondents thought the local effort criterion should be weighted the same or higher, with most (31%) indicating the same. 26% did not answer the question.

- A slight majority (51%) of respondents thought the local priorities criterion should be weighted the same or higher, with most (34%) indicating the same. 29% did not answer the question.
- Other criteria suggested to add:
 - More emphasis on preventative efforts & the information & education components
 - Lower value of local prioritization points
 - Natural resource protection
 - Greater importance for water quality & ESA important fish habitat concerns
 - Add court orders to "Federal & State Mandates."
 - PSWOAT
- Criteria suggested to delete:
 - Local prioritization
 - Salmon restoration
 - Shellfish

Simplicity of the Process

- 43% of applicants thought the pilot process was fair to poor. 26% thought it to be average, while 23% thought it to be good to very good.
- 42% of the applicants thought the clarity of the application questions was fair to poor. 26% thought it was average. 20% thought the clarity was good to very good.
- 37% of applicants thought fairness of the pilot process was good to very good. 20% thought it was average. 25% though it was fair to poor.
- Overall, 40% of respondents rated the pilot good to very good. 26% rated it average. 25% rated it fair to poor.

Ecology Assistance

- 69% of respondents requested Ecology assistance in preparing their application.
- 63% of respondents reported Ecology's assistance to be helpful to very helpful. 29% did not answer the question.
- Telephone assistance was rated to be helpful to very helpful by 71% of the respondents. 29% did not answer the question.
- Direct mailings were rated to be helpful to very helpful by 62% of the respondents. 31% did not answer the question.
- Ecology's homepage was rated to be helpful to very helpful by 60% of the respondents. 29% did not answer the question.

- The application workshops were rated to be helpful to very helpful by 60% of the respondents. 29% did not answer the question.
- The application form was rated to be helpful to very helpful by 74% of the respondents. 20% did not answer the question.
- The application guidelines were rated to be helpful to very helpful by 79% of the respondents. 14% did not answer the question.

Summary of Comments

- Local prioritization was unorganized and awkward.
- Local prioritization pitted organizations against each other.
- Local prioritization was very time intensive.
- Local prioritization points were not fairly given.
- Ecology needs to give applicants a specific list of groups to be contacted for local priorities.
- The application had way too many questions. Lots of redundant questions.
- Criteria favored Puget Sound and shellfish.
- Local prioritization process dominated by counties.
- Many questions were irrelevant.
- Process is ok don't change it.
- Some contradictions in Ecology staff responses.
- Process strongly favored jurisdictions with tribes, shellfish habitat, or failing septic systems.
- Less weight was given to water quality or ESA-related issues/concerns.

Applicants' Survey Tabulations

1. Did you submit a water quality financial assistance application to Ecology this year?

Yes	32 (91%)
No	3 (9%)
NA	0

(If yes, continue to number 3. If no, continue to number 2.)

2.	If you did not apply, why not? Select the answer closest to your reason for not applying. The application time period (January – February) did not meet your schedule or needs.
	Ecology's projected amount of money available for this funding cycle was too limited.
	The new application process was too complex.
	Reasons not directly associated with Ecology's rating and ranking, process, or funding amount.
	Other (Briefly explain.)

- There should be some pre-screening process to give us an idea of whether our project is a good one in the eyes of Ecology.
- The system used by Ecology to evaluate application strongly favored jurisdictions with tribes, shellfish habitat, or failing septic systems. Less weight was given to water quality or ESA-related issues/concerns.
- Applied in 1997 and was awarded watershed planning funds.
- Not planning any projects at this time.
- This year, Ecology used a new rating and ranking criteria system: water quality problems or needs, proposed solutions, local efforts, federal and state mandates, and local prioritization.

3. Overall, were these the right criteria?

Yes	22 (63%)
No	9 (26%)
NA	4 (11%)

4. If no, why?

- Local prioritization on the local county level was unorganized and partial (?) as it relates to ranking project.
- The local prioritization was very awkward and seemed to pit organizations against each other
- All but the 100 points for local prioritization. This ate staff time only to bring together the agencies/applicants in our county. Except for the battle for the 100 points there was no county unification on priorities or "bonding" going on. It was a waste of time & money. Add the 100 points in somewhere else.
- Local priority points were not fairly given. We need Ecology to deliver us a specific list of groups to be contacted.
- General comment: I did not pay attention to the criteria/headings just the questions themselves, & there were TOO MANY! 1-3 questions per criteria should be ample, since they are essay-style. We end up repeating ourselves & it feels like we have to tailor each response so we are saying the same thing slightly differently on many questions (see comments later)
- The criteria strongly favored the Puget Sound area see #2 above.
- Local prioritization will not work because the raters are all competitors.
- See comments at the end, "Local Prioritization" is not local enough.
- Did not address the rate users in smaller populated communities.
- They were fine.
- Local prioritization across several watersheds, using new state lead entities and planning groups just starting against well-established groups, caused extremely excessive use of several people's time to get a prioritization. Difficult to fit much-needed projects into this criteria.

- 5. What criteria would you add?
 - More emphasis on preventative efforts & the information & education components
 - Lower value of local prioritization points; I understand intent of using a local prioritization, but I have never fully seen it work in 3 different states. Who has authority locally to organize it?
 - You've covered them well, but . . .
 - Natural resource protection
 - Greater importance for water quality & ESA important fish habitat concerns
 - Add court orders to "Federal & State Mandates."
 - None at this time.
 - PSWOAT
 - See attached comments
- 6. What criteria would you delete?
 - Local prioritization
 - The priority on salmon restoration greatly influences the amount of money set aside for certain projects. Although I am an advocate for salmon, the money used for these projects appears to be disproportional (see sheet).
 - Shellfish not everyone in Washington benefit from marine shellfish concerns in Puget Sound.
 - None at this time.
 - Local priorities was a massive headache for the points gained. Explanation in guidelines was misleading.
 - Local prioritization needs **SERIOUS** work. Cumbersome, time consuming and incredibly difficult to rank local partners work. Takes away the cooperative spirit.
 - The priority rating system was cumbersome for a small grant like mine.
 - None
 - Local Prioritization.
 - See attached comments
- 7. The criteria were weighted (percentage of total points) as follows. For each of the criteria, should they be weighted:

Water quality problems or needs – 32%

1 /	1
Higher	4 (11%)
Same	21 (60%)
Lower	1 (3%)
Not at all	0 (0%)
NA	9 (26%)

Proposed solutions – 32%

Higher	5 (14%)
Same	19 (54%)
Lower	2 (6%)
Not at all	0 (0%)
NA	9 (26%)

State/federal mandates - 14%

Higher	7 (20%)
Same	12 (34%)
Lower	7 (20%)
Not at all	1 (3%)
NA	8 (23%)

Local efforts – 12%

Higher	10 (29%)
Same	11 (31%)
Lower	5 (14%)
Not at all	0 (0%)
NA	9 (26%)

Local priorities – 10 %

· · · · · I	
Higher	6 (17%)
Same	12 (34%)
Lower	3 (9%)
Not at all	4 (11%)
NA	10 (29%)

8. How simple was the process?

Very Good	1 (3%)
Good	7 (20%)
Average	9 (26%)
Fair	7 (20%)
Poor	8 (23%)
N/A	3 (9%)

9. How clear were the application questions?

Very Good	2 (6%)
Good	5 (14%)
Average	9 (26%)
Fair	11 (31%)
Poor	4 (11%)
N/A	4 (11%)

10. How fair was the process?

Very Good	1 (3%)
Good	12 (34%)
Average	7 (20%)
Fair	5 (14%)
Poor	4 (11%)
N/A	6 (17)

11. Overall, how would you rate the new funding process?

Very Good	1 (3%)
Good	13 (37%)
Average	9 (26%)
Fair	5 (14%)
Poor	4 (11%)
N/A	2 (6%)

12. Did you ask for Ecology staff assistance in preparing your application?

Yes	24 (69%)
No	8 (23%)
NA	3 (9%)

(If no, continue to number 14. If yes, continue to number 13.)

13. How helpful was Ecology staff?

Very Helpful	14 (40%)
Somewhat Helpful	5 (14%)
Helpful	3 (9%)
Somewhat Not Helpful	3 (9%)
Unhelpful	0 (0%)
N/A	10 (29%)

Rate the following methods of receiving information and assistance about the application process.

14. Phone conversation(s)

Very Helpful	15 (43%)
Somewhat Helpful	6 (17%)
Helpful	4 (11%)
Somewhat Not Helpful	1 (3%)
Unhelpful	0 (0%)
N/A	9 (26%)

15. Direct Mailings

Very Helpful	5 (14%)
Somewhat Helpful	5 (14%) 5 (14%)
Helpful	12 (34%)
Somewhat Not Helpful	1 (3%)
Unhelpful	1 (3%)
N/A	11 (31%)

16. Ecology's Internet Home Page

Very Helpful	5 (14%) 10 (29%) 6 (17%)
Somewhat Helpful	10 (29%)
Helpful	6 (17%)
Somewhat Not Helpful	2 (6%) 2 (6%) 10 (29%)
Unhelpful	2 (6%)
N/A	10 (29%)

17. Application Public Workshops

Very Helpful	9 (26%)
Somewhat Helpful	6 (17%)
Helpful	6 (17%)
Somewhat Not Helpful	1 (3%)
Unhelpful	3 (9%)
N/A	10 (29%)

18. Application Form

Very Helpful	6 (17%)
Somewhat Helpful	9 (26%)
Helpful	11 (31%)
Somewhat Not Helpful	1 (3%)
Unhelpful	1 (3%)
N/A	7 (20%

19. Application Guidelines

Very Helpful	6 (17%)
Somewhat Helpful	11 (31%)
Helpful	11 (31%)
Somewhat Not Helpful	2 (6%)
Unhelpful	0 (0%)
N/A	0 (0%) 5 (14%)

20. Other Comments:

- Local ranking efforts don't work if the county has little/no understanding/interest in the process
- Get us a list of local agencies to be contacted.
- Ecology has access to lists we don't have. We didn't even know about a sewer district in our county, and that would have made a difference on at least one of our proposals.
- We found many of the questions irrelevant to out loan applications for wetlands acquisitions. I feel that these should be a different application for loans which is similar but simpler than the one for grants. They should also be measured by separate criteria based on the type of project that you are applying for.
- To really simplify ask us for concise explanation of the problem, the solution, and how it addresses mandates! Give suggestions for factors that you need addressed. Asking 30 questions is asking for writer's apathy. We can't afford the time it takes to come up with eloquent answers over and over (collectively). However, my primary complaint is with the local prioritization. Think hard about your objective for this before repeating it. Guidelines were poor; method itself had many flaws (e.g., county vs. WRIA boundary ranking area). I spent nearly 25 hours, myself, arranging for the ranking letter and signatures, etc., and explaining the process so that three applications could be ranked in our county. This amount of effort was duplicated by the other applicants. The cost of this time is significant to all of us taxpayers. It was a tedious and inefficient process, at best. Equally as disturbing is the fact that it put us in point-blank competition with our partners in water quality protection
- See #2
- Some questions geared more to in/on-the-ground monitoring. Constructions projects difficult to address with involvement of education projects.
- Local prioritization category needs to be reworked. It resulted in a process of large (not local) municipalities, WRIAs, etc. Rated projects
- #8 Pulling together all of the backup was very time consuming. Allowing references to doc's without providing the backup would be easier for applicants.
- Local ratings are difficult when comparing facility projects with NPS projects. I suggest you offer an example of how to fairly rank these at the local level.
- E-mail was very helpful.
- Change local prioritization process!!
- There seemed to be some redundancy in the questions. Also, local prioritization points given by DOE didn't reflect local priorities from watershed forum documentation.
- The process is okay keep it the same so we learn the playing field.
- Ecology staff did not seem to have a handle on how the pilot process worked, did not have answers, seemed to have a "we'll see how it goes" attitude in answering questions. NOT HELPFUL IN DEVELOPING A PROPOSAL THAT THE LOCAL WATERSHED PROCESS HAS DETERMINED IS NEEDED.

- Some of the questions at public workshop resulted in contradicting answers from DOE staff. Facility vs. Treatment definition was a case in point, with some definitions of facility being unreasonably rigid and unrealistic. The response to the applications was more flexible and realistic than the bureaucratic interpretation at the workshop.
- Keep Local ranking as a criteria
- Questions are being asked about the water quality problems, "does the problem affect..." but there is no clear statement of the problem until question I.I. Suggest the problem should be defined first in this section, not last.
- Documenting the extent of a problem seems to exclude most projects that could be developed to protect or maintain water quality. It would appear from the grant application that the emphasis would be on restoring the worst cases and hoping that the better waters stay that way. Once these better waters are degraded to a certain point, then they would be eligible for project funding. Is that what you want? Suggest to have more questions that apply to either prevention or pollution.
- The first several questions address characteristic uses of surface waters that are protected by water quality standards, but water quality standards are not allowed as a basis for problem definition in several questions. There seemed to be a contradiction about what constitutes a water quality problem. Under the grant application criteria, local health issues or emergency orders seem to be the criteria for determining if there is a water quality problem. This would give more emphasis to point sources instead of nonpoint sources and populated areas over less populated areas. A good example of this contradiction would be swimming closures. In rural areas, there might not be established beaches or monitoring of swimming conditions; however, state water quality standards are set at levels to protect primary contact recreation. If a water body is listed on the 303(d) list, the state is required to take action to develop a TMDL for the parameters leading to the listing. This would make one believe that a water quality problem exists. The 1998 Washington State Water Quality Assessment Section 305(b) Report defines support (or lack of) by the frequency of standard violations. If support of primary contact recreations is POOR based on Ecology's definition, then by definition, the problem does affect primary contact recreation despite lack of documented closure.
- Ecology says we have a problem that affects primary contact recreation, but we can not get any points in section I.E. of the application for having a problem. In contrast, applicants will probably get points for having an aesthetic problem in I.F. where there will often be less evidence of a problem than in I.E. Suggest do not limit points in I.E. to frequency of closure only.
- The fact that shellfish were broken out as question I.D. provides a West Side advantage. Ecology has heard this before because it was mentioned at the first grant workshop and defended by Dan Filip. I can not remember his rationale for this category. Suggest to place more point emphasis on water quality concerns that are similar statewide, such as 303(d) parameters.
- There is not enough emphasis on 303(d) parameters; too few points are assigned to I.J., 303(d) list. For example, affected agricultural supplies gets 15 points, but parameters listed on the 303(d) only get 25 points. Is this not a grant for water quality projects? Then why not emphasize documented water quality standard violations?

Points for fish and wildlife habitat issues will get up to 75 points from I.C. and I.C., compared to 75 points for 303(d) issues in I.J.-L. Suggest more points should be assigned to 303(d) issues and less to habitat issues. Do not over emphasize issues addressed by other state funding sources.

APPENDIX B. Survey of Evaluators

Evaluators' Survey Responses

Introduction

To gather input on the pilot from evaluators and program developers, a survey was conducted. The survey was sent in the middle of June 1999 to 57 staff and managers with a one-month response return requested. The survey was re-sent prior to deadline to get as high a degree of return as possible.

49 of the 57 individuals were directly involved in developing the pilot and/or evaluating proposals. The remaining 8 individuals were supervisors of staff participating in the pilot. These supervisors also participated in various aspects of the pilot.

Of the 57 individuals sent the survey, 20 responded. This is a 35% return rate.

The main points expressed are below. Survey tabulations are attached.

Characteristics of Respondents

- 70% of the respondents work in the nonpoint source arena.
- 70% of the respondents work in regional or field offices.
- All four Ecology regional offices submitted at least one response.
- All three headquarters sections submitted at least one response.
- Responses were received from the Conservation Commission.
- The large majority of respondents (90%) evaluated proposals in the pilot.

Training

- While the majority of evaluators attended an internal training on administering the pilot, a sizeable minority of respondents (35%) did not attend. A few evaluators who did not attend the training workshop received one-on-one training from the program developers.
- Only one respondent did not find the training and evaluation guidance helpful. Over 75% of respondents found the training and guidance helpful. The remainder did not take the training or answer the question.

Duration to Evaluate Proposals

- Three-quarters of the respondents reported it took up to 3 hours to evaluate each proposal. The median duration is 2 hours per proposal.
- The respondents reported evaluating a total of 327 proposals. In the pilot, a total of 565 evaluations were conducted.⁵ Therefore, respondents to this survey were involved in conducting 58% of all proposal evaluations in the pilot.

Evaluative Criteria

- A large majority of respondents (85%) reported that they were not involved in the development of the evaluative criteria, guidance, or workshop.
- Five persons (25%) did not provide a response to the question should criteria be weighted higher, the same, lower, or not at all.
- Respondents were fairly equally divided on whether the water quality problem/need criterion should be weighted higher, the same, or lower, with a slight majority (55%) favoring higher or the same and most respondents (30%) favoring the same.
- 70% of respondents felt the proposed solution criterion should be weighted higher or the same, with most respondents (40%) favoring greater weight.
- A majority of respondents (55%) thought that the weight of the state/federal mandate criterion should remain the same. No one favored a higher weight, while 20% thought it should be lower.
- 35% of respondents thought the local effort criterion should be weighted the same, while an equal number (20% each) thought it should be higher or lower.
- 50% of the respondents felt the local priorities criterion should stay the same weight. One person (5%) thought it should be weighted higher; one person (5%) thought it should not be weighted at all; and three persons (15%) thought it should be weighted lower.
- Other criteria suggested are:
 - Degree of past funding: the more money received in the past, the fewer the points.
 - Specific elements of methods and technologies: more detail workplan.
 - Readiness to proceed.

-

⁵ An evaluation is the review of a grant or loan proposal. Multiple staff reviewed the same proposal.

Local Priorities

• The majority of respondents (75%) reported that they were not involved in the development or in responding to inquiries regarding the local priorities process.

Pilot Participation

• Most respondents (95%) recognize they are part of the evaluation of the pilot. Half of them (50%) report their time spent on the evaluation to be under three hours each. Four respondents (20%) report their involvement to be over eight hours each.

Summary of Comments

- Requires lots of staff time.
- Suggests separate equal pots of money for preventive and corrective projects.
- Confusion over endangered fish.
- Evaluators resorted to lots of "best professional judgment" (i.e., self-interpretations) when evaluating projects.
- Better guidance is needed to reduce subjectivity.
- Perception that criteria favored western Washington.
- System failed entirely.
- Questions not clear and duplicative.
- Application too long and cumbersome.
- Far too subjective.
- Predetermined to reflect what Advisory Committee wanted.
- Criteria are not right.
- System cannot be trusted.
- Every evaluator must attend a consensus building workshop in order to be allowed to rate proposals.
- Need a mechanism to change or delete obviously wrong evaluations (e.g., points awarded to eastern Washington proposals for impacted commercial shellfish harvest areas).
- Need more lead time to develop a polished application and local priority process for next year.
- The process did not capitalize on regional staff knowledge and priorities.
- The process favored good grant writing skills.
- We need a better way to fund watershed planning implementation.

Evaluators' Survey Tabulations

1. Did you evaluate a water quality financial assistance application to Ecology this year?

	1 /
Yes	18 (90%)
No	2 (10%)
Not Applicable/No Answer	0

2. Did you attend the training workshop for staff?

Yes	13 (65%)
No	7 (35%)
Not Applicable/No Answer	0

If no, did you contact other staff who attended to become knowledgeable about the Pilot Project Evaluation system and its explanations?

Yes	4 (20%)
No	3 (15%)
Not Applicable/No Answer	13 (65%)

3. Was the workshop helpful in direction on how to use the Pilot Project Evaluation System?

Yes	15 (75%)
No	1 (5%)
Not Applicable/No Answer	4 (20%)

4. Was the project evaluation guidance helpful?

Yes	16 (80%)
No	1 (5%)
Not Applicable/No Answer	3 (15%)

5. How long did it take you to complete one evaluation of an application (in hours)?

1-2 hours	10 (50%)
2-3 hours	5 (25%)
3-4 hours	1 (5%)
4-5 hours	0
5-6 hours	0
6-7 hours	0
7-8 hours	1 (5%)
>8 hours	1 (5%)
Not applicable/	2 (10%)
No answer	

- 6. How many applications did you evaluate?
 - 3

 - 4

 - **6-8**
 - 4

 - 0

 - 6
 - 9

 - 6
 - 6
 - 0
 - 6
 - 8
 - 327 total evaluations (of total 565 or 58% of all evaluations)
 - NA: 2
- 7. Were you involved in the development of the criteria (including reviewing drafts)?

Yes	3 (15%)
No	17 (85%)
Not Applicable/No Answer	0

8. If you were involved in the development of the criteria, how many hours did you spend on their development?

1-2 hours	0
2-3 hours	0
3-4 hours	1 (5%)
4-5 hours	0
5-6 hours	0
6-7 hours	0
7-8 hours	0
>8 hours	2 (10%)
Not applicable/	17 (85%)
No answer	

9. This year's major criteria were weighted (% of total points) as follows: water quality problem or need = 32%; proposed solution = 32%; state/federal mandates = 14%; local effort = 12%; and local priorities = 10%. For each of these criteria, should they by weighted:

	Higher	Same	Lower	Not at all	Not applicable/
					No answer
WQ	5 (25%)	6 (30%)	4 (20%)	0	5 (25%)
problem/need					
Proposed	8 (40%)	6 (30%)	1 (5%)	0	5 (25%)
solution					
State/fed	0	11 (55%)	4 (20%)	0	5 (25%)
mandate					
Local Effort	4 (20%)	7 (35%)	4 (20%)	0	5 (25%)
Local Priorities	1 (5%)	10 (50%)	3 (15%)	1 (5%)	5 (25%)

10. What other major criteria should have been used, if any?

Past distribution of state and federal moneys. (RCW 70.146.010)

Too new to the process to make any recommendations.

How well does the applicant plan to evaluate the success of the project? How cost-effective is the project? (I've always felt that small, modest, do-able projects should get special consideration over the huge amorphous programs.) Raters should get an opportunity to line-item components that they think are good, and components that they think are bad – in case it gets into a situation where a lesser pot will be offered. For instance, there was an application for a "Watershed Institute" that was humungous and bloated. But it included the combination of a very successful program called Home-A-Syst/Farm-A-Syst. Too bad all that gas blew the worthy part away!

Development of specific elements of "methodologies and technologies proposed to use to address the water quality problem" need to be encouraged within the scoring system. Items such as a thorough project description, organized budget, task by task project outline, project evaluation are essential parts of any proposal. One or more of these items where lacking in a number of FY2000 proposals. This information is critical to the development of a working grant agreement. It is the most important criteria that displays whether the applicant is organized enough to effectively implement the project.

This covers it.

How would you have proposed we weight them?

Have the applicant indicate all past and present funding, the amount and what was accomplished. The more they have received funding for, the fewer points they receive. This would get at the applicants that keep inventing new projects or that do the same project but a slightly different location. The intent is to become self-supporting, not have other agencies programs be continuously supported by Ecology funding.

WQ problem/need and Proposed Solution: Lower. This was one of my big concerns in evaluating the education projects. Most nonpoint education is preventive in nature. If there isn't a problem yet, but you want to protect water quality, you gain a log of ground through helping people appreciate what they have. Under the pilot system, projects to cure problems that have already happened scored better than preventive problems, and

that weighed against many worth while education projects.

While I suggest adding more weight to the WQ Problem/Need category, I disagree with the sub-categories and their weight. As an example, (and I believe an analysis of the scores would support this) a very serious local environmental problem that did not happen to be associated with ESA or shellfish closures would generally receive fewer overall points than a less serious problem, based on the required sub-category point system.

Readiness to proceed should be weighted higher.

By the old system.

Decrease slightly the weighting for WQ problem and proposed solutions to make room for increasing weighting for local effort and priorities. Especially for non-point projects, local commitment is very important for short- and long-term successes. This rewards and encourages local communities because of their efforts.

My comment is on the weighting given to the proposed solution criteria (32%). It seems to me that somehow this should be related to the project's necessity. Another words, if there is no WQ concerns or other regulatory necessities behind (driving) the project then the proposed solution should carry little or no weight.

WQ problem: 35%; Proposed solution: 35%; State/fed mandate: 10%; Local effort: 10%; Local priorities: 10%

11. Were you involved in the development of the application and guidance (including reviewing drafts)?

Yes	4 (20%)
No	16 (80%)
Not Applicable/No Answer	0

12. If you were involved in the development of the application and guidance, how many hours did you spend on their development?

1-2 hours	0
2-3 hours	0
3-4 hours	1 (5%)
4-5 hours	1 (5%)
5-6 hours	0
6-7 hours	0
7-8 hours	0
>8 hours	2 (10%)
Not applicable/	16 (80%)
No answer	

13. Were you involved in the development of, or involved in responding to inquires of, the local priorities component (including reviewing drafts)?

Yes	4 (20%)
No	15 (75%)
Not Applicable/No Answer	1 (5%)

14. If you were involved in the development or responding to questions on the local priorities component, how many hours did you spend?

1-2 hours	1 (5%)
2-3 hours	2 (10%)
3-4 hours	0
4-5 hours	0
5-6 hours	0
6-7 hours	0
7-8 hours	0
>8 hours	1 (5%)
Not applicable/	16 (80%)
No answer	

15. Were you involved in the development or conduct of the evaluation training workshop or one-on-one trainings?

Yes	1 (5%)
No	19 (95%)
Not Applicable/No Answer	0

16. If you were involved in developing or conducting the workshop, how many hours did you spend?

1-2 hours	0
2-3 hours	0
3-4 hours	0
4-5 hours	0
5-6 hours	0
6-7 hours	0
7-8 hours	0
>8 hours	1 (5%)
Not applicable/	19 (95%)
No answer	

17. Were you involved in the pilot evaluation? (Hint: if you are reading this, the answer is yes)?

Yes	19 (95%)
No	1 (5%)
Not Applicable/No Answer	0

18.	If you were	involved	in the	nilot evalua	tion, how	many hours	did you	spend?
10.	II you wore	111101104	III tile	prior e i arac	111011, 110 11	many mound	ara you	spena.

1-2 hours	7 (35%)
2-3 hours	3 (15%)
3-4 hours	0
4-5 hours	1 (5%)
5-6 hours	0
6-7 hours	0
7-8 hours	1 (5%)
>8 hours	4 (20%)
Not applicable/	4 (20%)
No answer	

19. Other Comments?

Our evaluation process uses an enormous amount of staff time.

Perhaps we should have two paths – one for preventive, one for corrective – and require that the two categories receive equal dollar amounts.

People (applicants) seemed to be confused over whether or not their project (question IC) addressed a threatened or endangered fish species proposed for listing. I would suggest attaching or providing an actual list for them to reference. We had a hard time finding out ourselves.

[The workshop was helpful]...in some areas, not really in others. As we discussed some of the finer points, it seemed we defaulted to "best professional judgement" quite often.

There are many opportunities to design a more streamlined and equitable review process even if you kept the same basic application. For example, it would be more fair and efficient to have one person, who happens to be a specialist in ESA, assign points to all the projects relative to how the proposal would impact ESA listed areas. Likewise for drinking water, shellfish and some of the other issues. This would minimize the "spread" you probably saw due to different raters using slightly different "Best Professional Judgement".

Better guidance is needed for future ratings to reduce subjectivity.

It seems that the projects that did get awarded funding this year heavily favored Western Washington. The rating criteria may have played a part in this, due to ESA and Salmon. Subjectivity in how each individual reviewer awarded points also played a part. Subjectivity can never be eliminated from the review process completely, but I believe it can be minimized more for the next rating round. All project raters need to have the same basic understanding on when to award and not award points for specific criteria. In my opinion not all raters had the same understanding on a number of the criteria during this first rating cycle.

[The workshop was] helpful, but not everyone got the same ideas from the workshop. I think staff still did what they wanted, not necessarily what should have been done.

If the purpose was to be objective, this process failed. If the purpose was to be transparent, this process failed. If the purpose was to have a fair system, this process failed. The application was too confusing to applicants and forced them to stretch the truth and even lie about their projects so they could try and get more points. Only those

who were somewhat familiar with the projects probably could detect some of this, which could have resulted in higher scores by some raters. It took the applicants a lot longer to fill out and at a much higher cost. This system penalized those not able to afford professional grant writers. This system took a lot longer to rate the applications and the ratings were still too subjective. It appears that some raters gave maximum points for projects to make it easier and faster to rate instead of really analyzing the application for what is was worth. Either that or because an application was in a rater's area, they rated them high just to try and make sure they were funded, whether or not the application was as good as the rating. The questions were confusing even for the raters as the evaluation workshop showed, and continued into the actual ratings, I believe. The local prioritization points caused a lot of confusion, frustration, and were not assigned properly. At the workshops, the presenters were confused as to local priority requirements, and this confusion was passed on to the potential applicants. At the workshops it was an all or nothing deal; get some points for getting the signatures or get no points if you didn't. Points were then assigned whether all signatures were obtained or not, and those who may have honestly missed a signature were penalized by not getting the points they should have. The local prioritization was just another way to try and get grants funded in 2514 areas where the local groups were already established, or close to being established. I still think that at least one application which was funded was a duplication of 2514 funding. After a 2514 group is funded by stating they would address quantity, quality, and habitat so they would rate high, then after they get their money, say they are only going to do quantity, they shouldn't be eligible to get funded for the quality work they originally stated they would do under 2514. At this time, I don't have the actual points assigned by raters outside of this region, for this regions applications, which I would like to see, but it doesn't appear that the evaluation system worked too well when there are point differences of 2-3 hundred points when the maximum points for most applications was 680 or less, plus the local prioritization points. As you can tell, I don't care much for the process and the resulting scores. The process was a lot more time consuming and less effective than the way we did it last year. The only reason most may think this new system works is because of the additional money the legislature put in this year, so the majority of applicants got funded. That's enough for now, I'm sure I will have other comments later.

Overall there was not clarity and consistency on how the each ranking item was to be answered. Even during the workshops to explain these, there was not agreement on how these items should be interpreted so there was not clear guidance.

There was high duplication of ranking items. For example we saw public health and fish issues repeated under problem definition and state and local priorities, public health got beans under drinking water, primary contact, etc. The overlap of issues, particularly in the area of problem definition and state and local priorities, seemed endless.

Too many points were given to problem definition and state and local priorities and not enough to problem solution. This meant that some really bad projects where there were more severe problems would get funded over some really good projects. Also, this sets up a prioritization of degraded areas over important good water quality areas that we may want preserved.

There appeared to be some inherent unfairness in the application. For example, coastal areas could get points for both marine and fresh water points. Does this mean these areas have higher priority than inland areas?

- (a) Part 2 of the Application was entirely too long and very cumbersome to use. In my opinion, there were far too many questions (Subsection IA-L consisted of 12 major questions; IIA-G = 7 questions; IIIA-F= 6 questions; IVA-I= 9 questions); some of the questions in each subsections I-IV were very similar to each other and some applicants simply repeated the same or slightly modified answers over and over again.
- (b) Formatting and numbering system using Roman numerals was very awkward to use; it would have been a lot simpler and easier to reference specific questions by using a "decimal/alpha" type of numbering system (e.g.: 2.1, 2.1a, 2.1b2.4a, 2.4b, 2.4c, 2.4d, etc).
- (c) Something has to be done on future application forms to limit the size of the application and amount of material that an applicant is allowed to submit. For example, some were less than 1/4" thick and others the size of the city telephone directory (2"-3" thick) with an excessive amount of extraneous material which added absolutely no value to the application and which was not even looked at. The vast multitude of unnecessary attachments that accompanied some of the applications needs to be discouraged. Only the documentation specifically required by a given question should be attached to the application. Maybe the applicant should be penalized with some type of point deduction for submitting unnecessary documents.

Also, the applicant should be restricted to a specified maximum size of a response box (e.g.- 7" x 3" fixed size, or 15-20 typed lines, etc.) for each specific question.

- (d) The "in-house" evaluation form format needs to be more "user friendly" and allow the reviewer's typed response comments to "wrap" and fully print-out on 8.5"x14" size paper with out having to cut and paste.
- (e) For me it was very difficult to remain objective and not be frustrated when certain communities circumvented the grant/loan application process and went directly to the legislature for funding even though they had not followed the required STEP process and did not have the necessary prerequisite approved documents.
- (f) I don't feel that this "pilot" method for rating/ranking a project on a point system is any better than the various methods that have previously been used by Ecology. It is still possible for too much subjectivity and prejudice to enter into the evaluation process. Maybe by having more "yes/no" or multiple choice boxes for certain questions and responses and relying less on "essay" type of written responses would help. It definitely would eliminate having to make a judgement call as to whether or not the written response adequately addresses the numerous "subquestions" contained in the main question. I'm sure that it would shorten the amount of the evaluator's time spent on each application.

[Was the workshop helpful?] I thought it was at the time, but in rating the applications, I ran into problems. And from reviewing the ratings from our region, and seeing the final results and scores, I have great doubts as to the helpfulness of the workshop.

[Was the project evaluation guidance helpful?] Not as much as I hoped it would be. I thought there would be more additional notes from the workshop, which would have provided better guidance.

[Were you involved in the development of the criteria?] We tried to be, but didn't feel our input was really wanted or considered in the development of the criteria. Our review comments were better received sometimes. I felt this process was predetermined to reflect what the Committee wanted, and the collective experience and expertise was useful only when it supported the committee's agenda, and ignored when it didn't.

[Are the evaluative criteria the right ones and appropriately weighted?] I am not answering this question because I don't think the criteria categories are well formed or balanced for fairness. The types of criteria and their value should be the subject of further discussion at the staff follow-up workshop. We don't necessarily need to have the final say, but we should have the opportunity to give our input.

In order for this evaluation of the pilot project to be productive, you should be asking questions such as the following:

- Was the application form simplified or made more complex? (Far more complex)
- Was the rating form simple or too complex? (Far too complex)
- Was the rating more or less objective than expected? (Far too subjective)
- Did the best projects get funded? (Who knows?)

General comments:

In comparing our scores in this region, it certainly appears that the ratings were more subjective than objective. Too many questions called for "best professional judgement" which meant a wide variety of responses. How did the different regions compare as to "objectivity"?

In order to get points, many of the applicants provided responses to questions that had to be discounted and points not given. Using the training we had at the workshop, did we all make the same "judgement" or were there differences among the raters, the regions, headquarter's evaluators, outside evaluators? Did you compare the points for the questions for consistency, or just accept the rater's judgement? Did this make a difference in the scores of projects?

In our training workshop, we reviewed an application that the group agreed should receive few points and should have received a low rating. Yet that project ended up high on the list, and without the benefit of local priority points. So how did that happen? In the real evaluation the project must have been given points that the group said it didn't deserve. What does this say about this pilot rating process? TO ME IT SAYS THAT

THE PROCESS CAN'T BE TRUSTED.

There are some real FLAWS that have to be fairly addressed. In order to do this, everyone who is evaluating the process - INCLUDING THE ADVISORY COMMITTEE - has to be aware of the problems and flaws. The survey questions above don't begin to get at my concerns about this pilot process.

The process this year did not take advantage of the knowledge and priorities of the regional office. For example, a good grant was submitted that would have addressed a water quality problem, but the grantee did not do a good job filling out the application. Despite the need for this project, and the regional knowledge about their excellent past record in completing and managing grants, we were unable to fund them. Grant skill writing has replaced need and ability. Also, the lack of discussion within the region for regional grants and statewide for statewide grants inhibited the passing of information that would have been useful for the grant process. Additionally, there were misunderstandings about what the criteria meant and how to apply it; sometimes there was no or insufficient information in the guidance. There is still an urge to rate "my watershed" grants highly despite the merits of the proposal-part of the "balkanization" that the watershed process seems to develop. Folks seem to have a hard time looking at the larger picture and ranking proposals on their merits (or lack thereof). My humble opinion as per your request

There has to be a better way especially if we are serious about WS planning and implementation need to have Money placed based. Not ranked and rated state wide.

We need to require that EVERY evaluator attends the **consensus building workshop** (not actually a training workshop, by the way) and not accept evaluations if they don't. It should be up to the regional supervisors to make sure their staff attend.

We need a mechanism where program-wide staff can change or delete obviously wrong evaluations - for example if a project to eradicate lake weeds in Stevens County was given 30 points for impact on commercial shellfish harvest areas.

More lead time is needed to develop a more polished application and local priority process next year.

APPENDIX C. Comparison of Applicants and Evaluators Surveys

Evaluative Criteria

Criterion	Applicants	Evaluators
WQ problem/need	60% same, 71% same or higher	30% same, 55% same or higher
Proposed solution	54% same, 68% same or higher	30% same, 70 same or higher
Mandates	34% same, 54% same or higher	55% same, 75% same or lower
	or lower	
Local effort	31% same, 60% same or higher	35% same, 55% same or higher or
		lower
Local priorities	34% same, 51% same or higher	50% same, 65% same or lower

Themes

Applicants

- Local priorities process broken
- Application was time intensive
- Criteria favored Western Washington
- Too many and redundant questions in application

Evaluators

- Too much best professional judgment (BPJ), too subjective
- Need better guidance
- Process was time intensive
- Criteria favored Western Washington
- Too many questions

In Common

- Process was time intensive
- Criteria favored Western Washington
- Too many questions