

BERKSHIRE REGIONAL PLANNING COMMISSION

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Executive Director

October 5, 2006

Review Team Evaluation Comments
c/o Woodlot Alternatives, Inc.
30 Park Drive
Topsham, ME 04086

RE: Housatonic River Natural Resources Damages Projects

Dear Natural Resources Damages Trustees:

The Berkshire Regional Planning Commission has briefly reviewed the types of projects submitted and the scoring of them for consideration by the Trustees. For those not familiar with the Berkshire Regional Planning Commission, we serve as the regional planning agency for the 32 municipalities in Berkshire County. Our policy body consists of 2 municipally appointed members from each municipality. Our core mission is to provide technical assistance to our member municipalities and to foster the enhancement of the region's human, natural and manmade resources.

We were glad to see that a range of projects had been submitted, many from groups with a strong local base and strong involvement in the communities along the river which have been affected by the environmental damages. We are not going to speak to the relative merits of individual proposals, some of which involve our agency directly or indirectly. However, we do have some concerns with the overall process that seems to be evolving for reaching decisions regarding which projects are worthy of funding. We also are concerned about a possible bias in the scoring of particular types of projects.

Overall Process

As Trustees, you have gone to a great deal of expense and considerable effort to develop what is probably the most elaborate system to evaluate and rate project proposals we have witnessed in our forty year history as an agency. You have also gone to considerable lengths to make it a transparent and open process thus far. However, at the meeting on September 21st when the scoring of projects was discussed and released, it was indicated that the scores are only advisory when making final decisions and that you, as individual trustees, would be reaching your own conclusions which might or might not directly reflect the project scores. This seems to compromise the transparent decision-making and open process which has been highly touted over the past two years. We would strongly encourage the Trustees to base their decisions heavily on the scoring. This recommendation does not necessarily serve the BRPC well, as several projects we have a role in score fairly poorly and none of ours are in the top five. If you do not base decisions on the scores, to keep any perception that this is a fair and open process, you should

document very thoroughly why you varied from the scores. As a caveat, when scores differ only by a point or two, we should all be able to recognize those are meaningless differences in a somewhat subjective evaluation methodology.

We are also concerned over some indication that the weight of public comments received on the proposals and their scoring will be used to influence the funding decisions. While public comments should certainly be allowed and welcomed, we believe the use of them should be limited to the technical aspects of the proposals. It is far easier for a large, well-established and well-funded organization to generate a large number of comment letters than it is for a small, locally based and volunteer organization to do so. This would automatically favor the large, established organizations to the possible detriment of picking the best projects.

Scoring of Particular Types of Projects

After reviewing the evaluation comments and the types of projects, it appears to us that the Trustees' scoring reflects some biases towards certain types of projects and against others. Projects which will take some planning and require consensus building, but which may have the potential for major, long terms benefits tend to score poorly. As an agency which views good planning as a core value, this troubles us. Other projects which may be well-developed in concept and far along in specifics, but which do not offer significant benefit to the larger community because they are more focused, tend to fare well in the scoring.

We also have concerns that the scoring seems to favor land acquisition or access improvement projects. We can appreciate that the Trustees would like to see very tangible outcomes. However land acquisition and physical improvements tend to be very costly. The question is, are we trading long-term and potentially far-reaching benefits of several educational and community building projects which have more diffuse benefits for a few, very tangible physical projects? Of the top five scoring projects, four involve land acquisition or access improvements. In reviewing the notes from the project evaluations, there appear to be the same kinds of questions about feasibility, definition or building partnerships in many of the higher scoring projects as in the mid to even lower scoring ones. It appears that there is a bias to projects that have tight outcomes that have been defined over ones that have a broader vision or purpose. We encourage the trustees to achieve an even balance between those projects with long term, potentially far reaching benefits as well as more limited discreet projects in the final selection process.

We appreciate the opportunity to comment on the projects and their scoring. We also thank the Trustees for their hard work on a very difficult charge.

Sincerely,



Nathaniel W. Karns, AICP
Executive Director