

State of Washington
Joint Legislative Audit and Review Committee (JLARC)



Follow-up: 2001
Investing in the Environment
Performance Audit

Briefing Report

January 5, 2005

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in alternative formats for persons with disabilities.*

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The Joint Legislative Audit and Review Committee (JLARC) carries out oversight, review, and evaluation of state-funded programs and activities on behalf of the Legislature and the citizens of Washington State. This joint, bipartisan committee consists of eight senators and eight representatives, equally divided between the two major political parties. Its statutory authority is established in RCW 44.28.

JLARC staff, under the direction of the Committee and the Legislative Auditor, conduct performance audits, program evaluations, sunset reviews, and other policy and fiscal studies. These studies assess the efficiency and effectiveness of agency operations, impacts and outcomes of state programs, and levels of compliance with legislative direction and intent. The Committee makes recommendations to improve state government performance and to correct problems it identifies. The Committee also follows up on these recommendations to determine how they have been implemented. JLARC has, in recent years, received national recognition for a number of its major studies.

**FOLLOW-UP: 2001
INVESTING IN THE
ENVIRONMENT
PERFORMANCE AUDIT**

BRIEFING REPORT

JANUARY 5, 2005



STATE OF WASHINGTON
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BACKGROUND

JLARC completed its Investing in the Environment Performance Audit in January 2001. A summary of JLARC's report is included as Appendix 1. The audit identified a need for a significant shift in providing environmental grants and loans to local governments and nonprofits, moving away from distributing allocated funds toward strategically investing state dollars to achieve cost-effective, long-term environmental benefits. It also highlighted a need to streamline and better integrate services across 12 programs operated through state agencies and funded in the state capital budget.

Since 2001, JLARC staff completed three follow-up reports. For the third follow-up report, approved at JLARC's June 2004 meeting, we surveyed 80 representatives from local governments and nonprofits that apply for and use state environmental grants and loans. We got their feedback on whether state programs had streamlined and improved services. Their responses indicate that they are generally pleased with the individual progress of state programs. Collectively, however, local jurisdictions cite the need for the programs to improve service coordination.

STATE AGENCY UPDATES

At Committee members' request, JLARC staff sent a memo to the state agencies that manage the environmental grant and loan programs, providing them with the opportunity to update the Committee on any activities or progress that they have made coordinating services to local jurisdictions. Their updates are provided in Appendix 2.

Most agencies report that they have made efforts to improve coordination to better serve local jurisdictions. Following is a summary of highlights from the five agencies:

- The **Department of Ecology** reports that the programs involved in the audit have improved coordination and service to local jurisdictions. Specific examples, by program include:
 - The *Local Toxics Remedial Action Grant* program has updated its application to include definitions that are consistent with other state and federal programs. The program has also coordinated with other state and federal agencies to maximize funding options for potential projects.
 - *Water Quality Financial Assistance* has funded several projects sponsored by multiple jurisdictions, and actively encourages applicants to consider such approaches, as they are often the most cost effective. The application and evaluation criteria are consistent with other state and federal grant and loan requirements, and include environmental investment and outcome funding evaluation criteria—the result of JLARC’s Investing in the Environment Report.
 - *Local Toxics Coordinated Prevention Grants* provides an annual forum for funding recipients to meet, coordinate statewide projects, and develop statewide goals for the program. The program also reports that it has worked with grant applicants to improve the application form.
- The **Public Works Board** reports that it has engaged in efforts to develop a standardized application. The program reports that initial versions have proven cumbersome and frustrating to applicants; however, the program is continuing in these efforts. The Board notes that it has funded numerous projects with the Department of Health and the Transportation Improvement Board. It also reports that it has developed a database that will provide jurisdictions and policy makers with information on projects funded in the past, and those planned for the future. The Board is working to bring other agencies onboard with this program. Finally, board representatives visit local governments—over 200 annually—to discuss pending projects. In the course of these meetings, they determine if these projects might be linked with other projects in that community or neighboring communities.
- The **Conservation Commission** reports that it has worked with the Department of Ecology to jointly fund and administer conservation district grant programs. It has also coordinated the timing and presentation of programmatic changes of its Water Quality Implementation Grants Program to align with Ecology’s Water Quality Funding Program timing and programmatic changes. The Commission also participates on Ecology’s Water Quality Financial Assistance Council and Infrastructure Assistance Coordinating Council. This participation has aided the Commission’s efforts to standardize definitions and evaluation criteria with other agencies that fund similar programs.
- The **Interagency Committee for Outdoor Recreation/Salmon Recovery Funding Board** reports that its evaluation process has shifted from the Board evaluating individual projects to assessing how well each lead entity’s list of projects addresses priorities identified in the lead entity’s strategy.¹ The agency reports that this will aid coordination efforts among technical

¹ There are 26 lead entity groups in the state. Lead entities are voluntary organizations under contract with the Washington State Department of Fish and Wildlife. Lead entities define their geographic scope and are encouraged to largely match watershed boundaries. Applicants for SRFB grants are submitted to the board through these groups, comprised of citizen and technical committees.

advisory groups, citizen committees, and the SRFB review panel. Additionally, the SRFB worked with National Oceanic and Atmospheric Administration scientists to develop consistent performance measures for all Pacific Coast Salmon Recovery-funded projects.²

- The **State Parks and Recreation Committee**, which administers the Boat Pumpout program, did not report any progress in improving services to local jurisdictions.

SUMMARY

In general, state agencies have worked to coordinate services to local jurisdictions. While some efforts, such as a standardized application, are not likely to be in place in the near future, agencies report that they are collaborating to improve services and the ease of use of applying for and using state environmental grant and loan funds.

The agencies' updates are consistent with findings from previous follow-up efforts. As the most recent follow-up and previous reports have demonstrated, agencies have implemented several key recommendations from the original Investing in the Environment performance audit. Key changes that resulted from the audit include agencies changing the application and selection processes, engaging stakeholders in revising the evaluation criteria and developing outcome-based performance measures, and improving outreach efforts to local governments and other grant and loan applicants.

² The SRFB reports that it receives $\frac{2}{3}$ to $\frac{3}{4}$ of its grant funds from Congress through the Pacific Coast Salmon Recovery Fund.

APPENDIX 1 – 2001 REPORT DIGEST

**INVESTING IN THE
ENVIRONMENT: ENVIRONMENTAL
QUALITY GRANT AND LOAN
PROGRAMS**

REPORT 01-1

REPORT DIGEST

JANUARY 22, 2001



STATE OF WASHINGTON

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**ENVIRONMENTAL QUALITY GRANT AND LOAN
PROGRAMS PERFORMANCE AUDIT**

Twelve capital budget programs administered by six agencies provide grants and loans to local governments and other entities to maintain, restore, or enhance environmental quality. Examples of the broad range of projects and activities funded by the programs include construction of sewage treatment plants, hazardous waste cleanup, dairy waste management, environmental education, and salmon habitat restoration. Approximately \$440 million has been budgeted for these programs in the 1999-01 Biennium – the largest amount in their history.

This audit was initiated by the Joint Legislative Audit and Review Committee (JLARC) in response to legislative interest in the performance of the programs. The audit focuses on two primary themes: the investment performance of the programs (their effectiveness in financing projects with high environmental quality returns), and their collective ability to serve local government environmental investment needs.

Program Overview

Most of the programs have been created since the mid-1980s to respond to emergent environmental issues in the areas of water quality, solid and hazardous waste management, habitat loss, and, most recently, endangered species recovery. The programs play an important role in a complex environmental quality system. They distribute the vast majority of the funding the state provides to local governments for environmental quality purposes, and consume **over one-fourth of the state's overall natural resources budget**.

Requests for program funding have been growing. The number of funding applications increased 37 percent over the past five years. During this time, programs were able to accommodate 59 percent of the \$1.4 billion in total funding requested.

There are large variations in the amount of funding provided to projects across the state's 39 counties. There are, however, **no comprehensive environmental indices** that might be used to explain these variations or gauge the impacts of expenditures. Our analysis shows that program funding allocations closely follow population – more funding is consistently allocated to projects taking place within counties with higher populations.

Distributing Versus Investing

Environmental investments are intended to produce a return of quality improvements in water, land, or species resources. Without measurable returns, it is impossible to determine if investments have been effective. Measuring investment returns can be difficult, particularly within large and complex environmental systems.

It is often not clear how individual projects contribute to long-term solutions over time. Many of the **systemic environmental issues** we are now facing in Washington, such as salmon recovery and water quality planning for entire river basins, pose significant new challenges to making investments and measuring their returns.

Solid data is missing for monitoring environmental quality, learning from past projects, and coordinating investments across programs. While some steps have been taken towards developing meaningful environmental performance measures and coordinating projects, these efforts are only in their infancy.

At this time, the one output that is most clearly and consistently documented across programs is that money has been distributed. Thus, the programs under this audit can be characterized as being primarily **distributional** in nature.

Program Investment Practices

Based on our research of environmental funding programs in Washington and other states, we developed a **model** for evaluating program investment practices. The model's 16 key investment practices represent a new program benchmark—a **framework for deliberate environmental investment decision making**. In comparing program structures and operations to the model, we found that many **programs performed well on basic practices related to funding distribution, but poorly in practices that ensure the effectiveness of investments**. Adoption of some of the missing key investment practices could shift the focus of program activities away from distribution and towards investment results.

Local Government Perspectives

Eighty-two local jurisdictions and organizations across Washington that have applied for and/or received program funding commented on their capacity to make sound environmental investments, as well as on program services.

These 82 local entities identified a number of barriers to making strategic long-term environmental investments at the local level. Several cross-program service issues that increase the time, complexity, and cost of accessing program funding were also identified. Individuals from local entities offered a series of structural and process improvements to increase local capacity to make sound investments and improve program services.

Recommendations

The report includes six recommendations intended to achieve the following:

- **Increase the systematic collection and sharing of information** about applications for funding, project locations, baseline conditions, and investment outcomes that can be used to plan and design projects, coordinate investments across programs, evaluate investment performance, and learn from past investments;
- **Integrate practices from the investment model into program structures and operations** to shift the focus of program activities towards making sound environmental investments;
- **Streamline and better integrate program services** to local governments; and
- **Ensure that funding agencies work together** to achieve these goals.

By implementing these recommendations, **confidence surrounding the state's environmental investments can be increased and services to local governments can be improved**. Being able to more clearly define and efficiently produce desired long-term environmental results across programs can help **increase certainty that policy-makers' intent to spend scarce public resources effectively will be achieved**.

APPENDIX 2 – AGENCY UPDATES

- Conservation Commission
- Department of Ecology
- Interagency Committee for Outdoor Recreation/Salmon Recovery Funding Board
- State Parks and Recreation Committee
- Public Works Board

November 2004

Department of Ecology Response to JLARC Report 04-09:

Follow-up: 2001 Investing in the Environment Performance Audit

Ecology scored well on most of the recommended practices in the initial 2001 performance audit, indicating generally good management practices for investing in the environment. Ecology has taken JLARC's follow-on recommendations seriously, as discussed in our earlier progress reports. In June, 2004, JLARC finished its analysis of a survey of local governments it conducted last spring, following up on the 2001 Investing in the Environment Performance Audit. JLARC found:

The survey responses indicate that local jurisdictions are generally pleased with the individual progress of several of the state grant and loan programs; however, some jurisdictions would like the state programs to work collectively to continue to improve services:

- *Application Phase:* Improving the ease of the application process across the programs;
- *Monitoring Phase:* Working with local jurisdictions to develop realistic and useful outcome measures; and
- *Cross-Agency Coordination:* Collaborating with other programs to better streamline the process and better serve respondents.

In transmitting the report to agencies, the Legislative Auditor offered "to provide agencies the opportunity to update the Committee on any coordination activities that are currently underway. Specific areas of interest include:

- Standardization in application forms and definitions;
- Assistance identifying projects in jurisdictions which might enhance or complement projects that are either planned or occurring in other jurisdictions;
- Cross-agency funding of projects that wish to jointly apply;
- Coordinating the timing and presentation of changes which directly affect local jurisdictions; and
- Any existing barriers that prohibit program coordination that could be addressed by legislative action."

This report summarizes how Ecology's four affected grant programs are responding to the five areas of concern JLARC raised after the survey of local governments.

1. Standardization in application forms and definitions:

Ecology is very supportive of the idea of a generic application form and process for basic applicant information and data. This could benefit both the applicants and the funding agencies in producing, obtaining, and tracking basic applicant information and data. This basic applicant information could be used for tracking and reporting of information to the Legislature, the Environmental Protection Agency, and other state and federal agencies during the project evaluation process and for grant and loan contract development. Sharing this kind of high-level information, roughly the first page of an application, in a data base was the subject of an earlier effort which had some limited success.

Ecology has not recently discussed the possibility of developing a complete standardized application form for grants and loans or establishing common definitions with other state agencies. A related early effort led by the Department of Transportation required after-the-fact entry of this kind of information in a tracking system which could be shared by multiple agencies. Although the basic applicant information could be captured in a generic beginning for all application forms, it would be very challenging for Ecology and other state agencies to develop a standardized approach and definitions for the project evaluation portion of a grant and loan application. The challenge results from each funding agency operating on a different set of funding criteria, goals, and objectives. At this level, making better-informed decisions about which proposals to fund, on a competitive basis, as JLARC has recommended, requires gathering information on each application, specific to the proposed project and its intended outcomes.

- **Water Quality Financial Assistance Program:** The rating and ranking criteria in Ecology's Water Quality Financial Assistance Program application form reflects diverse water quality-focused state and federal grant and loan requirements, project priority considerations, statutory purpose and intent, and state and federal regulatory requirements. Ecology has also included environmental investment and outcome funding evaluation criteria in its application to meet statutory direction from the Legislature based on earlier recommendations from JLARC's Investing in the Environment Report.

The Water Quality Financial Assistance Program has been recognized nationally by the Environmental Protection Agency for its highly successful innovative, cost-efficient and effective process of integrating the application process, fund distribution, and project management of state and federal grants and loans for water quality improvement and protection. This integrated approach has allowed Ecology to streamline and reduce the number of application processes from three to one by using one standard application form and one project rating and ranking process for three multi-million dollar state and federal grant and loan programs. This process also allows Ecology to leverage and coordinate state and federal funds managed by Ecology with other agencies, subject to state and federal funding uses and limitations.

- **Local Toxics Remedial Action Grant and Loan Program:** Upon revision of the Remedial Action Grant and Loan program guidelines, the agency updated the grant application forms and instructions to be more user-friendly. The application includes links between budget and planned outputs and outcome measures. The revisions to the guidelines improved the clarity of the various grant and loan programs eligibility requirements and the prioritization and evaluation process. The program continues to strive to provide top quality technical and informational assistance as needed to applicants throughout the application process.

The program is currently in the process of updating the Remedial Action Grant and Loan Program rule (WAC 173-322) providing updated and/or new definitions that will be consistent with other federal and state programs. The rule will be re-structured to be more user-friendly, and to more clearly define applicant eligibility requirements. The rule update will also incorporate the need to address the environmental benefits of any grant and/or loan project, as JLARC recommended.

- **Local Toxics Public Participation Grants Program:** Trying to standardize this application with other state grant programs would lose the built-in levels of evaluation and measurement which presently exist in the application. Due to the uniqueness of the Public Participation Grant Program, the grant application forms have been designed to guide the applicants in developing their projects. The forms lead the applicant in a logical progression of steps or phases that build upon each other as the project design comes to fruition. Written into the application form is the requirement to address levels of measurement of environmental protection and/or behavioral changes.
- **Local Toxics Coordinated Prevention Grants Program:** The Coordinated Prevention Grant (CPG) program does not have similar goals as other grant/loan programs; therefore we have not focused on standardizing our application forms with other programs. We have, however, been working with our grant recipients (local governments) to continuously improve our application forms.

2. Assistance identifying projects in jurisdictions which might enhance or complement projects that are either planned or occurring in other jurisdictions:

Ecology's grant programs encourage inter-jurisdictional planning and coordination, appropriate to the types of projects being supported. Examples are provided by program:

- **Water Quality Financial Assistance Program:** Ecology's Water Quality Program regional office staff provide extensive engineering technical assistance to local governments and tribes involved in comprehensive regional planning, site specific planning, design and construction of wastewater facilities projects. Local governments involved in a wastewater treatment system project are required to evaluate cost-effective and efficient alternatives and options that may include regional and inter-jurisdictional coordination and services to meet the wastewater needs of the community. Ecology strongly encourages local coordination and a regional approach

to wastewater treatment and funding management when considering the initial capital cost for the planning, design, and construction, as well as the long-term operation, maintenance and replacement (OM&R) cost. The impact to rate payers is also a key consideration in funding determinations. This process ensures that all regulatory and environmental issues are addressed by a local government and provides for opportunities for multi-jurisdictional coordination. This process also provides an opportunity for local governments to investigate other potential state and federal grant and loan funding sources for the project.

Ecology's Water Quality Financial Assistance Program participates in the Infrastructure Assistance Coordinating Council (IACC). The IACC is a volunteer organization comprised of representatives from state and federal agencies that assist local governments with infrastructure financing and technical assistance. Approximately 50 major financing and technical assistance providers have participated in and coordinated through IACC for nearly 20 years. In all, they represent about 250 programs that assist local governments with infrastructure issues. IACC conducts an annual conference to inform local governments, clients, and stakeholders about the various funding opportunities available for infrastructure and technical requirements that must be met to apply for and receive funding. The IACC routinely helps to identify and coordinate the needs of local governments across the state and match up those needs with appropriate funding agency programs. Ecology fully supports this process and routinely participates in joint meetings with other funding agencies and local jurisdictions to provide technical support and funding program information. Ecology also participates with other state and federal agencies on technical teams specifically to assist small communities that need more dedicated assistance.

Ecology, Community Trade and Economic Development (CTED), and the Department of Health (DOH) recently supported a CTED request for the Governor's budget to continue financial support of the Small Communities Initiative (SCI). The SCI supports a staff person tasked with providing non-regulatory technical support to small communities that are struggling with compliance issues, securing financial assistance, and addressing complex technical issues. Providing SCI technical support helps improve small community's ability to meet technical requirements and should improve their chances of success with applications for financial assistance.

- **Local Toxics Remedial Action Grant and Loan Program:** The Remedial Action Grant and Loan program has provided funding to multi-jurisdictions to conduct area-wide studies of the chemical fallout from ASARCO (counties included are Seattle/King, Tacoma/Pierce, Kitsap, and Thurston), and to measure lead and arsenic soil contamination across the state caused by the use of pesticides on orchard lands.

A number of grants have been coordinated with the schools/school districts for the cleanup of lead-arsenate soil contamination for this current 2003 – 2005 biennium. We anticipate that many more school cleanup projects will be coordinated in future biennia because of the prevalence of the problem and the effects of lead on childhood development.

Okanogan and Spokane County Health Department/Districts have received grant funding to conduct area-wide soil contamination studies. These studies will be incorporated into a larger more comprehensive study of multi-counties that will assist local jurisdictions and Ecology to develop long term strategies.

- **Local Toxics Public Participation Grants Program:** The Public Participation Grant Program has and will continue to award grants to not-for-profit associations, many with statewide affiliates. These associations often work with their local affiliates in a statewide education and outreach effort, such as on mercury and electronics issues.

PPG recipients are encouraged to contact and work with local governments to assure that projects compliment and not duplicate efforts. Where cleanup sites cross jurisdictional borders, the associated PPG grants serve the citizens in the multi-jurisdictional area.

Public Participation Grant recipients have coordinated and developed projects that have been incorporated into a school district/school classroom curriculum which later is shared with other schools and/or school districts.

- **Local Toxics Coordinated Prevention Grants Program:** Projects are coordinated within each county by the local Comprehensive Solid Waste Management Plan. All CPG projects must be consistent with the county's plan in order to receive funding. Ecology is working to coordinate projects statewide by developing statewide goals for the CPG program that are consistent with local funding priorities and the State Beyond Waste Plan. The goals are drafted at the State Solid Waste Summit ("Summit"), a meeting of local government solid waste experts and Ecology solid waste staff that occurs every other year. The Summit also provides an opportunity for grant recipients to share information about their programs with one another.

3. **Cross-agency funding of projects, or providing consideration to jurisdictions that wish to jointly apply:**

In general, Ecology's grant programs anticipate that different parts of a project are appropriately funded from different sources. Ecology supports there coordinated efforts, and also tries to ensure that there is no inappropriate duplication of funding.

- **Water Quality Financial Assistance Program:** Ecology encourages local governments to investigate and utilize all local, state and federal financial assistance that may be available to make a project affordable within the uses and limitations of the various funding programs. The Ecology application for financial assistance addresses funding from other agencies and the development of interagency agreements is supported in an effort to help local governments meet their funding and grant match requirements.

Ecology makes every effort to coordinate with other funding agencies to ensure that funding program requirements are met and there is no duplication of funds used for the same activity or component of a project. Ecology routinely engages in joint technical assistance meetings with other funding agencies (Community Development Block Grant, Public Works Trust Fund, and Department of Agriculture-Rural Development) to work with small communities in need of financial assistance to plan, design and construct wastewater treatment facilities that are needed to protect human health and the environment.

- **Local Toxics Remedial Action Grant and Loan Program:** The Remedial Action Grant/Loan Program continues to coordinate with other agencies such as the Department of Natural Resources, Community Trade and Economic Development and the Environmental Protection Agency to maximize funding options for potential projects.

A large component of the redevelopment and cleanup efforts of the Everett ASARCO arsenic contaminated site was the extensive coordination efforts between agencies to provide multiple sources of funding. Those involved were the Everett Housing Authority, the City of Everett, the Environmental Protection Agency, the community of Tacoma, the Department of Ecology, and the National Trust Fund account.

The Toxics Cleanup Program continues to support a Brownfields position at the Washington State Department of Community, Trade and Economic Development (CTED). This position works on Brownfields issues through a coordinated effort with the Department of Ecology, the Environmental Protection Agency Region 10, and other members of the Washington Revolving Loan Fund Coalition, which includes King County and the cities of Seattle, Tacoma and Spokane. Coordination involves providing technical assistance to local governments to help them secure funding, and conducting public outreach about the federal Brownfields program.

- **Local Toxics Public Participation Grants Program:** Some of the PPG recipients do receive additional funding from other sources; however, most state agencies aren't authorized to award funds to not-for-profit organizations/groups. On large and/or complex cleanup projects, grants have been awarded to more than one organization to address the issues at that site. The recipients are directed to coordinate with each other and support each project. The grants are written with specific tasks assigned to each organization that do not duplicate activities or efforts, but rather provide a more comprehensive coverage of education/outreach to the community.
- **Local Toxics Coordinated Prevention Grants Program:** The CPG program is the sole source of state funding for local solid and hazardous waste implementation, planning and enforcement. The CPG Statewide Goals include a goal that is specifically designed to encourage multi-jurisdictional, collaborative projects. Multi-jurisdictional, collaborative projects have also been encouraged in past CPG cycles.

4. Coordinating the timing and presentation of changes which directly affect local jurisdictions:

Ecology's primary focus when communicating grant program or application process changes is to provide information early to the key people affected by those changes. Ecology uses different coordination and communication venues, depending on the specific grant program.

- **Water Quality Financial Assistance Program:** Ecology makes every effort to inform local governments, Indian Tribes, clients, stakeholders, and other interested groups about the financial assistance programs, the application process and project evaluation and rating criteria, and any changes made to the program. Ecology provides this information through its annual statewide funding cycle application workshops (September), public meetings, mailings, news releases, conferences and the Water Quality Program Website. As noted above, Ecology also participates in the annual IACC conference, which includes funding agencies, local governments, and other stakeholders.

The Water Quality Program also has a standing advisory council composed of local, state and federal agencies and Indian Tribal clients and stakeholders involved in water quality improvement and protection. The Council provides advice and guidance to Ecology on proposed changes to rules, policies and program guidelines.

The Ecology Water Quality Program Website provides update information about funding availability, program requirements, application schedules, etc. During the four month period from July 1, 2004 to October 31, 2004, the financial assistance link of the Website has been visited approximately 6,600 times for an average of 650 visits per month.

- **Local Toxics Remedial Action Grant and Loan Program:** Remedial Action Grant Program Guidelines are revised every biennium as needed. This update process coincides with the legislative appropriation. This allows jurisdictions to have new and updated information in conjunction with new funding opportunities. Although jurisdictions can apply at any time, many potential applicants apply for new and additional funding when new allocations have been received by Ecology.
- **Local Toxics Public Participation Grants Program:** As each grant application period approaches, Focus Sheets are sent out to all parties that have shown or indicated an interest in the grant program. Any changes will be contained in these Focus Sheets, which are available 4-6 months in advance of the application process. The Focus sheets explain how interested parties can get the new guidelines.
- **Local Toxics Coordinated Prevention Grants Program:** The CPG program has been working with a stakeholder group, the CPG Workgroup, to make changes for the upcoming grant cycle well in advance. These changes will be incorporated into grant guidelines for the next cycle of CPG grants. The CPG program is also planning to host several pre-application "training" sessions for grant recipients to introduce changes early in the application period. The CPG cycles are now based on calendar

years, rather than Ecology Fiscal years. This change was made several years ago to accommodate local government budget years.

5. Any existing barriers that prohibit program coordination that could be addressed by legislative action.

Ecology's grant programs have not identified specific barriers prohibiting program coordination that could be addressed by legislative action. This invitation to comment does not seem to extend to resource constraints. (Resource constraints always exist, particularly for systems development issues. Ecology is engaged in a long-term effort to develop the data systems infrastructure and integration to be able to measure environmental outcomes and priorities for future investment, with some help from EPA.)