

# Proposed Changes to Local Government Match Requirements in the Washington Wildlife and Recreation Program's Local Parks, Trails, and Water Access Categories

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Recreation and Conservation Office staff recommend the adoption of policies for the Washington Wildlife and Recreation Program (WWRP) to reduce match requirements for some local governments. Currently, all local governments must provide at least 50 percent of project costs (a 50 percent matching share). In the WWRP, local governments are incorporated cities and towns, counties, federally recognized tribes, and special purpose districts with a jurisdiction boundary less than the entire state.

See [Appendix A](#) for background and rationale for these policy proposals.

Our [WWRP Web page](#) gives a general program overview.

Current WWRP Policies for the Local Parks, Trails, and Water Access Categories can be found in [Manual 10a, Washington Wildlife and Recreation Program, Outdoor Recreation Account \(March 2016\)](#).

Previously funded WWRP projects can be viewed on the RCO Web site using [Project Search](#) (look under "Theme or Fund Source")

To aid in policy review:

To get population estimates of cities, towns, and counties, go to Washington State Office of Financial Management [Population Estimates Web site](#).

For other information about communities such as income and education enrollment go to [U.S. Census American Fact Finder Web page](#) (select the 2015 ACS 5-Year Population Estimate).

## Policy Statements (and Questions)

The public is asked to comment on whether the Recreation and Conservation Funding Board should approve, or amend and approve, or reject, four policy statements ("Policy Pathways") contained in this public comment packet. Staff recommends adoption of all four. If adopted, these shall apply to applications submitted in 2018.

Comment on any aspect of these policies and RCO's implementation of the statutory change that allows reducing or waiving match. In addition, RCO would like you to consider the following questions:

- Are the population and income thresholds for the various policies appropriate?
- Is there a better measure of need (for reduced match) than median household income?
- Given finite grant funding, RCO's goal is to recommend policies that identify need in the most resource-deficient local governments in the state rather than every local government. Do you think that was accomplished?
- For "college towns," should college-enrolled populations be removed to get a "truer"

approximation of total population and median income?

- For the Federal Disaster Pathway, is the per capita damage value threshold appropriate? For those communities with no "direct" damage from the disaster event, is a sustained drop in an agency's gross revenue a good way to measure the need for reduced match?
- Trails projects may extend outside of a jurisdiction's boundary serving people otherwise not in a "community in need" or "underserved." Likewise, a Water Access project may be located in an affluent area but serve a much larger service area. Should the Trails and Water Access category policies speak to the unique qualities of these project types?

# 1) Policy Pathway: Communities in Need

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## Intent

Reduce the match required for projects located in smaller and less affluent jurisdictions where the ability to raise match is likely constrained.

## Policy<sup>1</sup>

If the grant applicant is a jurisdiction (city, town, tribe, special purpose district,) of 20,000 residents\* or less, and the median household income of that jurisdiction is below the state median household income, the applicant is eligible for a match reduction. The corresponding minimum match applies as detailed in Table 1.

**Table 1. Minimum Match for Communities in Need**

Jurisdiction's Median Household Income* as a Percent of State Median Household Income*	Minimum Match Required
0 to 50	10%
50.01 to 60	20%
60.01 to 80	30%
80.01 to 99.99	40%

Additional requirements:

1. The reduced match for a single project is limited to no more than \$500,000.
2. At least 10 percent of total project cost must be provided in the form of a non-state, non-federal contribution.
3. Existing grant limits apply.
4. Projects sponsored by more than one organization ("co-sponsors") shall not be eligible for a match less than 50%.

\* If the jurisdiction is home to an institution of higher learning (college, university) and the jurisdiction's population enrolled in college or graduate school makes up 20 percent or more of the applicant's jurisdictional population, 1) RCO shall recalculate the jurisdiction's population by removing the number of enrolled, and 2) RCO shall use the Median Family Income<sup>2</sup> and the State Family Median Income<sup>3</sup> instead of the Median Household Income and State Median Household Income to determine the minimum match required.

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<sup>1</sup>Data source shall be the best and most currently available from the US Census Bureau, or the Washington State Office of Financial Management, or other sources as may be appropriate.

<sup>2</sup> US Census

<sup>3</sup> US Census

## 2) Policy Pathway: Underserved Populations

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### Intent

For a low income jurisdiction (city, town, tribal area, special purpose district) of any population size, create a match reduction for projects located in a subarea of that jurisdiction where the income is lower than the jurisdiction as a whole.

### Policy<sup>4</sup>

Minimum match shall apply to the applicant if the applicant:

- 1) Is a jurisdiction (city, town, tribal area, special purpose district), whose median household income\* is 80% or less of the state median household income; and
- 2) the project is also located in a census block group where the median household income falls within the ranges as detailed in Table 1.

**Table 1. Minimum Match for Underserved Populations**

Census Block Group's Median Household Income* as a Percent of State Median Household Income	Minimum Match Required
0 to 55	10%
55.01 to 60	20%
60.01 to 65	30%
65.01 to 70	40%

Additional requirements:

1. The reduced match for a single project is limited to no more than \$500,000.
2. At least 10 percent of total project cost must be provided in the form of a non-state, non-federal contribution.
3. Existing grant limits apply.
4. Projects sponsored by more than one organization ("co-sponsors") shall not be eligible for a match less than 50%.

\* If the jurisdiction is home to an institution of higher learning (college, university) and the jurisdiction's population enrolled in college or graduate school makes up 20 percent or more of the applicant's jurisdictional population, RCO shall use the Median Family Income<sup>5</sup> and the State Median Family Income<sup>6</sup> instead of the Median Household Income and State Median Household Income to determine the minimum match required.

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<sup>4</sup> Data source shall be the best and most currently available from the US Census Bureau, or the Washington State Office of Financial Management, or other sources as may be appropriate.

<sup>5</sup>US Census

<sup>6</sup>Us Census

### 3) Policy Pathway: Counties in Need

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#### Intent

Reduce the match required for projects located in counties where the ability to raise match is constrained.

#### Policy<sup>7</sup>

Table 1 shows the match reductions (from 50%) that apply for any county in the state.

**Table 1. Match for Counties in Need**

<b>Variables (Any or all may apply)</b>	<b>50% Match Shall be Reduced by: (Cumulative)</b>
County Median Household Income less than 70% of State Median Household Income	10%
County Median Household Income less than 65% of State Median Household Income	10%
County is " <a href="#">Distressed</a> " as defined by WA Office of Financial Management	10%
60% or more of land is non-taxable*	5%
75% or more of land is non-taxable*	5%

\*Includes properties/land where the county receives payments in lieu of taxes.

#### Example:

*County A: Starting minimum match is 50%. County A has a median household income of 68% of the state median income which is a 10% reduction in required match. County A meets no other variables. So minimum match requirement in this case is 50% minus 10%. County A's minimum required match is 40%.*

*County B: Starting minimum match is 50%. County B has a median household income of 64% of the state median income, is a "Distressed" county, and 80% of its land is non-taxable. Therefore, County B has met all 5 equaling a match reduction of 40%. 50% minus 40% is 10%. County B's minimum required match is 10%.*

Additional requirements:

1. The reduced match for a single project is limited to no more than \$500,000.
2. At least 10 percent of total project cost must be provided in the form of a non-state, non-federal contribution.
3. Existing grant limits apply.
4. Projects sponsored by more than one organization ("co-sponsors") shall not be eligible for a match less than 50%.

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<sup>7</sup> Data source shall be the best and most currently available from the US Census Bureau, or the Washington State Office of Financial Management, or other sources as may be appropriate.

## 4) Federal Disaster

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### Intent

Create a match reduction for jurisdictions adversely impacted by a federally declared disaster. The intent of the policy is to support the recovery of assets damaged as well as long term economic/community recovery.

### Policy

Any eligible jurisdiction (city, town, county, special purpose district, and tribal area) that is a federally declared disaster area (Major Disaster), or located in a jurisdiction declared a federal disaster area (Major Disaster), shall have the following minimum match requirements for grant applications submitted within 5 years of the start of the (disaster) incident period.

**Table 1. Minimum Match for Jurisdictions Declared a Federal Disaster or in a Disaster Jurisdiction**

Threshold(s)	Minimum Match
1) Applicant is, or is within, a jurisdiction the President has declared a Major Disaster area under the Stafford Act, and the value of damage to the applicant <sup>8</sup> is at least \$3.61 per capita <sup>9,10</sup> .	10%
2) Applicant is within a jurisdiction the President has declared a Major Disaster area under the Stafford Act, and its annual gross revenues since the start of the (disaster) incident period have declined by 40% or more for two or more years since the start of the incident period.	25%

Additional requirements:

1. The reduced match for a single project is limited to no more than \$500,000.
2. The board's requirement that at least 10 percent of total project cost must be provided in the form of a non-state, non-federal contribution does not apply.
3. Existing grant limits apply.
4. Projects sponsored by more than one organization ("co-sponsors") shall not be eligible for a match less than 50%.
5. Grant requests using this Federal Disaster match policy shall be limited to 2 per jurisdiction (per biennium).

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<sup>8</sup> Eligible reported costs used to meet the county Public Assistance – Public Infrastructure Thresholds, published by The Federal Emergency Management Agency or the Washington Military Department..

<sup>9</sup> As reported to Washington Military Department and eligible for public assistance

<sup>10</sup> Subject to change. Per capita dollar value will be the current public assistance county or tribal damage threshold as published annually by the Federal Emergency Management Agency or the Washington Military Department.

# Appendix A.

## Background and Rational

### Statutory Change

The state Legislature mandated that the Recreation and Conservation Office (RCO) conduct a review<sup>11</sup> of the Washington Wildlife and Recreation Program (WWRP) in 2015. The following year Substitute Senate Bill 6227<sup>12</sup> implemented many of its recommendations. Among other changes to the WWRP, the bill (now public law) added the following underlined language to the existing statute<sup>13</sup>:

*"(4) The board may not approve a project of a local agency where the share contributed by the local agency is less than the amount to be awarded from the outdoor recreation account. The local agency's share may be reduced or waived if the project meets the needs of an underserved population or a community in need, as defined by the board."<sup>14</sup>*

The terms "underserved population" and "community in need" are statutorily undefined. The WWRP statute defines local agencies as "a city, county, town, federally recognized Indian tribe, special purpose district, port district, or other political subdivision of the state providing services to less than the entire state."<sup>15</sup> Therefore, the match waiver or reduction shall apply only to the WWRP grant categories in the Outdoor Recreation Account for which local agencies may apply.<sup>16</sup> Local Parks, Trails, and Water Access.

### Policy Development

At the February 2017 Recreation and Conservation Funding Board (board) meeting staff briefed the board on efforts to implement the new law (see [Item 13](#) from the February meeting), as well as the substance of an RCO-commissioned [report](#) by the [Washington State University Social and Economic Research Center](#). Staff also provided a summary of policy discussions with a statewide stakeholder work group (WWRP Match Waiver Work Group) that assisted this policy-making effort.

At the June 2017 meeting of the WWRP Match Waiver Work Group, attendees agreed on the four policy proposals ("pathways") now out for public comment. In addition, Dr. Alan Hardcastle confirmed that these pathways for obtaining a match reduction were generally aligned with his [2016 study's recommendations](#).

At the board's July meeting, staff presented [these current policy proposals, policy outcomes](#). Staff also provided notes on a recently commissioned [white paper](#) ("report") (and [work book](#)) from the Washington State Department of Commerce that provided insights on different ways to evaluate the ability of local governments to raise capital for park projects.

### Policy Rational

Based on feedback from the work group, the reports, and consultation with numerous professionals and public administration practitioners, staff concluded that median household income should be a foundational measure in identifying an underserved population and community in need. Measures of

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<sup>11</sup>Washington Wildlife and Recreation Program Review: [Report to the Washington State Legislature \(December 2015\)](#)

<sup>12</sup>[Substitute Senate Bill 6227](#),

<sup>13</sup>[Revised Code of Washington 79A.15](#)

<sup>14</sup>[Substitute Senate Bill 6227](#), Sec 7(4), Rows 15-20, p12

<sup>15</sup>Revised Code of Washington 79A.15.010(7)

<sup>16</sup>Revised Code of Washington 79A.15.050

income (and unemployment) can serve as a proxy for other socioeconomic indicators of a population's or community's hardship. Measures of income also may be a proxy for the strength or weakness of a community to raise revenue. Similarly, the size of an agency's population may be a factor in its ability to raise revenue for parks. Larger (populous) agencies likely can more easily raise money for parks as opposed to smaller agencies where revenue generation may be constrained. Considering the per capita cost of park development in smaller communities, larger communities may be better positioned to fund park development. Therefore, providing local governments more than one pathway to qualify for a match reduction responds to the inherent differences of agencies and their operating environments across the state.