

## Olympic Region Clean Air Agency

My first comment deals with which grants are covered by this rule change. It lists the Air Quality Local Partner Wood Smoke Reduction Grant. This grant is no longer funded through MTCA. It has been funded, when there are capital funds, through the State Building and Construction Grant. Those funds would therefore not be part of this Rule.

Reimbursement 2.3.5 WAC 173-323-100- In prior grant cycles we have been told by Ecology that once the budget is passed by the Legislature, and we knew our allocation amount, we could start to expend funds, even if the agreement hasn't been signed by both Ecology and ORCAA. This was very helpful for the woodstove grant when it was funded under MTCA, because the paperwork from Ecology could take months. This is an unwelcome change.

WAC 173-323-110 and 120 both show a lack of commitment to working with the grant recipient. Ecology can terminate the grantor or close out the grant when it wants to, based on the statements made in the proposed rule change. Section 3 in 120 states, that "Ecology at its sole discretion may elect to suspend or terminate the agreement". This is not the way an agency should be working with a grant recipient.

Feel free to contact me for further information.