Performance Audit

Regulatory Reform: Enhancing Regulatory Agency Coordination

July 20, 2015

Lawmakers in Washington have long recognized the need for coordination on regulatory matters among state and local agencies as a way to promote economic vitality and increase state program efficiency. We found that state agencies are currently coordinating some of their work, but agency staff describe much of that coordination as informal and initiated only on an "as needed" basis. Coordination could be improved through a more systematic approach; however, the state lacks a lead agency or long-term strategy to identify and prioritize opportunities for targeted, multi-agency coordination of regulatory processes, and to facilitate that coordination on an ongoing basis.

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Executive Summary

A strategic approach could improve regulatory agency coordination

Agency coordination on regulatory matters offers many benefits to both businesses and government, including reducing the time and cost of regulatory decisions. Lawmakers in Washington have long recognized the need for coordination among state and local agencies as a way to promote economic vitality and increase state program efficiency. We found that state agencies are currently coordinating some of their work, but agency staff describe much of that coordination as informal and initiated only on an "as needed" basis. Coordination could be improved through a more systematic approach; however, the state lacks a lead agency or long-term strategy to identify and prioritize opportunities for targeted, multi-agency coordination of regulatory processes, and to facilitate that coordination on an ongoing basis.

We conducted this audit to answer the following questions:

1. Are state agencies currently coordinating their processes to minimize resources needed for businesses' regulatory approvals?

2. Do opportunities exist for expanded coordination among Washington's regulatory agencies?

The state does not have a long-term strategy to identify and prioritize opportunities to coordinate

While several coordination efforts established by lawmakers for specific industry needs have been successful, Washington does not have a strategic approach to identify and prioritize new opportunities for such multi-agency coordination. A strategic, targeted approach would ensure ongoing coordination among regulatory agencies, which could result in significant benefits to businesses and government.

Several coordination initiatives directed by lawmakers included leading practices that should be systematically applied elsewhere

To help us learn more about existing regulatory agency coordination and additional opportunities, we looked at well-known coordination efforts directed by statute or executive direction, as well as three hypothetical business projects requiring multiple agencies' regulatory approvals. The three projects involved approvals from a total of 11 state agencies.

In each case, we compared the way agencies coordinated with both local and other state agencies to leading practices in coordination in four areas.

Four areas of leading practices

1 Communicating multi-agency requirements
- Transparent regulatory requirements

2 Coordination framework
- Interagency outreach to promote coordination
- Written policies and protocols
- Consistent regulations across agencies

3 Coordinating regulatory activities
- Concurrent regulatory activities
- Interagency sharing of applicant information
- Structured communication channels

4 Measuring coordination
- Performance measures
- Performance management

Three well-known coordination efforts, the Transportation Permit Efficiency and Accountability Committee (TPEAC), Washington's Shellfish Interagency Permitting Team (SIP), and the Seattle Restaurant Success Initiative, all shared leading practices that we did not always find in the coordination efforts of agencies involved in our three hypothetical business projects, such as:

- Interagency sharing of applicant information
- Written coordination policies and protocols
- Structured communication channels
- Measuring results of coordination activities
- Participation by local governments

TPEAC brought multiple interests and regulators together to coordinate environmental permitting for Washington's transportation projects. Through multi-agency collaboration, the committee developed numerous cross-agency "programmatic" permits for high frequency, routine activities. The SIP team developed a model permitting program as part of a larger effort to restore and expand Washington's shellfish resources to promote clean-water industries. During this process, the team developed a master list of requirements accepted by all permitting agencies. The Seattle Restaurant Success Initiative brought together multiple regulatory agencies and created user-friendly materials to help guide prospective restaurateurs through permitting.

Agency coordination is primarily based on existing relationships, rather than systematic practice

All of the agencies we looked at said they do some coordination of regulatory approvals for our hypothetical business projects, but all also said that at least some or most of the coordination is based on existing relationships between agencies and their staff, not on systematic coordination efforts.

Because the state lacks a strategic approach to coordination, and agencies' coordination efforts were not systematic, many of the leading practices we found in the well-known initiatives were not always found in the regulatory approval processes of the three business projects we evaluated. As part of our detailed recommendations, we suggest the state identify a lead agency to develop a long-term strategy for identifying and prioritizing opportunities, and to facilitate ongoing coordination.

Recommendations

To ensure ongoing coordination among regulatory agencies, reduce costs to government and businesses, and promote economic vitality, we recommend the Legislature assign a lead agency to:

1. Develop a long-term strategy for identifying and prioritizing multi-agency regulatory processes that can be streamlined through better coordination, based on such things as:

   - Industry needs determined in collaboration with businesses
   - Importance to the state
   - Potential for savings to businesses and agencies

2. Develop a timetable for prioritized regulatory processes to be streamlined through coordination

3. Identify agencies involved in each regulatory process to be streamlined through coordination

4. Convene agencies involved in those regulatory processes and facilitate ongoing coordination

5. Work with identified agencies on prioritized processes to:

   a. Scope and understand the problem
   b. Establish written policies and protocols for coordinating
   c. Identify structured communication channels between agencies
   d. Develop methods for sharing of applicant information between agencies to reduce duplication of what businesses need to submit, where possible
   e. Promote concurrent reviews of applicant materials or comment periods
   f. Ensure compatible regulatory requirements
   g. Develop and track performance measures

6. Report to the Governor and Legislature annually on:

   a. Progress of prioritized regulatory processes being streamlined through coordination
   b. Performance measures for each process

Introduction

Washington, like the rest of the nation, continues to emerge from the aftermath of the Great Recession. The ability to attract new businesses and help the state's nearly 525,000 existing businesses thrive is essential to the state's long-term economic vitality. By streamlining business regulations without sacrificing other essential objectives, such as preserving the environment or ensuring a safe workplace, we may find that the lower costs – to both businesses and government – will help the state attract and support business opportunities. One effective way to streamline regulation is by coordinating the business regulatory activities of the many state and local agencies involved in permitting and licensing.

To start or expand a business in Washington, business people must comply with regulations at the local, state and federal levels. State regulations alone can require a business owner to navigate the approval processes of multiple agencies. In many cases, the owner must deal with each agency separately, even when submitting applications and documents that serve similar purposes.

Where these agencies do not coordinate regulatory processes, the time the agencies need to reach decisions on those applications can be unnecessarily long. Sequential reviews by multiple agencies take longer than those that occur concurrently. Uncoordinated reviews that result in a "loop" of revisions, requiring a business to resubmit materials to multiple agencies, can delay decision-making processes. And conflicting requirements can cause unnecessary duplication of effort.

Increasing coordinated activities between regulatory agencies will not only benefit businesses, it can also improve the overall quality of decision-making by giving agencies opportunities to share their specialized knowledge, to test ideas, and to monitor each other.

In Washington, lawmakers have long recognized the value of coordination among regulatory agencies, directing them to improve coordination around regulatory approvals, usually to address specific types of business projects. Lawmakers have also directed agencies to measure how well their regulatory improvements are working. To do that, agencies must collect data and develop targets for improvement, then use that data to identify how to reach their targets.

We conducted this audit, the third in a series of audits to improve the state's interactions with businesses, to answer the following questions:

1. Are state agencies currently coordinating their processes to minimize resources needed for businesses' regulatory approvals?

2. Do opportunities exist for expanded coordination among Washington's regulatory agencies?

Background

Our Inventory of Regulations, initially published in October 2011 as part of our first audit on regulatory reform and updated in 2014, revealed that 26 state agencies issue more than 800 business permits and licenses, and conduct 326 inspections, as set out in **Exhibit 1**. Business projects can require regulatory approvals from numerous agencies. Someone preparing to open a small convenience store with a gas pump, for example, would have to get regulatory approvals from up to a dozen or more different state agencies, in addition to approvals from local jurisdictions.

Exhibit 1 – 26 state agencies administer 1,100+ regulations
Represents the number of uses for application forms listed in the Inventory of Regulations

Agency	Permits	Licenses	Inspections
Agriculture	13	79	51
Archeology	1	2	-
Board of Accountancy	-	1	1
Early Learning	-	3	6
Ecology	66	12	95
Employment Security	-	-	1
Financial Institutions	-	32	24
Fish and Wildlife	13	66	10
Gambling Commission	6	36	1
Health	23	102	26
Horse Racing Commission	-	2	-
Insurance Commissioner	1	35	1
Labor and Industries	13	12	23
Licensing	4	76	20
Liquor Control Board	13	50	6
Lottery	1	4	-
Natural Resources	13	-	21
Parks	2	-	-
Revenue	1	2	4
Secretary of State	-	22	-
Social and Health Services	-	51	13
Transportation	25	2	-
Utilities and Transportation Commission	4	19	7
State Patrol	-	12	14
Washington Student Achievement Council	-	4	-
Workforce Training & Education Coordinating Board	-	1	2
Total	**199**	**625**	**326**

Source: SAO Inventory of Regulations, 2014.

Lawmakers recognize the value of multi-agency regulatory coordination

Lawmakers in Washington have long recognized the need for coordination among state and local agencies, with legislators and governors directing agencies to improve coordination and integrate their regulatory decision making. Examples include:

- In 2003, the Legislature created the Office of Regulatory Assistance (ORA) within the Governor's Office to "…continually improve the function of… business regulatory processes…" (43.42.005 RCW). 43.42.060 RCW allows any project of statewide significance to request ORA's help in coordinating permitting processes of relevant agencies, at the cost of the project proponent. 43.42.092 RCW authorizes ORA to develop and advertise the availability of optional multi-agency permitting teams to provide coordinated permitting and integrated regulatory decision making on a cost-reimbursed basis.

- In 2013, Governor Inslee enacted Executive Order 13-04, requiring the director of each state agency, board, commission, and other organization to continuously engage in cross-agency collaboration. The Governor also retained Executive Order 06-02, directing agencies to work to reduce the burden to businesses of dealing with multiple state agencies. Each of the executive orders also directs state agencies to demonstrate accountability through the maintenance of performance measures.

- Also in 2013, the Legislature directed Washington's Department of Commerce to conduct multi-jurisdictional business regulatory streamlining projects (43.330.440 RCW) through a competitive process beginning with the manufacturing sector.

Businesses want better coordination among regulatory agencies

Businesses, too, acknowledge the value that coordination between regulatory agencies brings to the process of regulatory approvals. As part of our second audit on regulatory reform, we conducted four focus groups around the state, asking businesspeople about their experiences with and expectations around state permitting. We also solicited suggestions and recommendations to help solve the issues they identified. Lack of consistency across regulatory agencies emerged as a key issue in the focus groups.

Focus group participants pointed out that many regulatory decisions depend on staff judgment, which can vary depending on who is assigned to the project. Furthermore, agencies with overlapping jurisdictions may interpret the same term or concept differently. Multiple regulatory agencies involved in permitting a single project do not always communicate with one another, and can make conflicting determinations or have conflicting requirements. Participants stressed the need for consistent responses to questions or problems when working with multiple staff on the same project.

One example of legislative action to streamline permitting for a specific class of project

In 2001, the Legislature created the Environmental Permit Streamlining Act to help streamline the permitting of transportation projects within the state. The act resulted in the Transportation Permit Efficiency and Accountability Committee. The committee created a partnership between five agencies working out of the same office to permit state transportation projects. While the model was designed for public transportation infrastructure projects, the lessons learned and best practices that resulted from the effort provide valuable insights for regulatory coordination in general.

To help with permitting consistency, participants suggested the state:
- Ensure agencies do not have conflicting regulations
- Increase coordination, such as concurrent application reviews and public comment periods
- Assign a lead agency for multi-agency permits
- Develop "programmatic permits" that go across several agencies
- Encourage agencies to accept other agencies' documents

Coordination between regulatory agencies can reduce the cost to business and government

Sorting out conflicting regulatory requirements or juggling uncoordinated reviews between departments or local government entities can create additional work for government employees and cause considerable delay to a business project. The consequences for businesses include higher project costs and lost revenue. Prolonged approval processes can deter development, which in turn limits economic growth and reduces government revenue.

A number of state and national studies identify the effects of uncoordinated regulatory processes and delayed approvals.

- In a recent audit, the US Government Accountability Office (GAO) found that the Food and Drug Administration and the Centers for Disease Control, who both regulate some respiratory protective devices, could reduce time and manufacturers' costs through better coordination. Sequential approvals for manufacturers delay the benefits of new products. In addition, manufacturers must prepare and monitor two sets of applications, pay two sets of processing fees, and work with reviewers at two agencies.

- GAO concluded in a report about financial market regulation that "Effective [regulatory] coordination could help agencies minimize or eliminate staff and industry burden, administrative costs, conflicting regulations, unintended consequences, and uncertainty among consumers and markets."

- A study by PricewaterhouseCoopers showed a significant correlation between reducing permitting times and businesses making investments, and found that permitting delays reduce potential revenue that both government and businesses would otherwise generate.

- Businesses and state agencies reported that businesses will delay or cancel projects as a result of permit delays and difficulties, potentially decreasing property tax collections.

Scope and Methodology

We conducted three activities to answer our audit questions:

1. Researched national leading practices in interagency coordination
2. Evaluated five existing multi-agency coordination initiatives in Washington
3. Evaluated multi-agency approval processes for three hypothetical business projects

1. **Researching national leading practices.** Our evaluations of both existing coordination initiatives and our hypothetical projects compared current agency practices to leading practices in coordination. Our list of leading practices was based on performance audits pertaining to coordination of federal agencies conducted by the GAO and on research of coordination efforts in state and federal agencies. Our leading practices contain coordination activities that contribute to efficient regulatory processes in four areas of coordination:
   - communicating multi-agency requirements
   - building a foundation to coordinate
   - coordinating regulatory activities
   - measuring results

2. **Evaluating existing coordination initiatives.** To learn more about existing coordination efforts within the state, we compared leading practices in coordination to five high-profile multi-agency initiatives in Washington. Four came about as a result of either legislation or executive direction; one was instituted by the participating agencies. To learn about the initiatives, we reviewed information available online, and interviewed state and local agency staff and business representatives.

3. **Evaluating multi-agency approval processes for three hypothetical business projects.** To learn whether agencies coordinate with each other and with local jurisdictions, and to look for opportunities for additional coordination, we created three hypothetical business projects and reviewed the coordination activities of state agencies that would typically be involved in their development. The projects were: an assisted living facility, a restaurant with a full bar, and an inn on the waterfront with a recreation dock. Our choice of projects was based on industry growth, importance to the state, feedback from businesses, and to provide a broad representation of required regulatory approvals.

After identifying all business and regulatory agency activities involved in the projects and the actions or approvals needed from each, we sent a questionnaire to relevant agencies and interviewed staff. Finally, we compared the results of this review with leading practices in coordination.

Audit performed to standards

We conducted this performance audit under the authority of state law (43.09.470 RCW), approved as Initiative 900 by Washington voters in 2005, and in accordance with Generally Accepted Government Auditing standards (December 2011 revision) issued by the U.S. Government Accountability Office. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. See **Appendix A**, which addresses the I-900 areas covered in the audit. **Appendix B** contains more information about our methodology.

Next steps

Our performance audits of state programs and services are reviewed by the Joint Legislative Audit and Review Committee (JLARC) and/or by other legislative committees whose members wish to consider findings and recommendations on specific topics. Representatives of the State Auditor's Office will review this audit with JLARC's Initiative 900 Subcommittee in Olympia. The public will have the opportunity to comment at this hearing. Please check the JLARC website for the exact date, time, and location (**www.leg.wa.gov/JLARC**). The State Auditor's Office conducts periodic follow-up evaluations to assess the status of recommendations and may conduct follow-up audits at its discretion.

Audit Results

Answer in brief

We found that the state can do more to advance regulatory agency coordination with a long-term strategy to actively identify and prioritize opportunities for additional multi-agency coordination, led by an agency tasked with convening agencies to help facilitate that coordination.

The leading practices we used to evaluate agencies have proven success on the federal level

Our research on leading practices revealed many examples of successful coordination at the federal level. For example, the Department of Homeland Security leads a workgroup of eight agencies to share information and best practices. The Centers for Disease Control and Prevention and the Department of Agriculture conduct joint reviews of their regulations, allowing better information about the collective impacts of their rules on the regulated community. Housing and Urban Development and the Department of Transportation began to define and agree on their respective roles and responsibilities in 2009; doing so allowed them to clarify how they organize individual versus joint efforts and specify steps for decision making.

Based on the research, we established nine activities in four areas of leading practices as criteria for our evaluations of both the initiatives and the agency coordination on the three hypothetical projects.

1. *Communicating multi-agency requirements*

   - **Transparent regulatory requirements** – State websites provide regulatory requirements by industry or project type, and agency websites provide links or information about requirements in other agencies. Websites provide meaningful access for applicants, such as translation of regulatory requirements in industries that have high concentrations of business owners with limited English proficiency.
   The benefit: Business owners spend less time finding the information they need to comply with regulations. Agencies may need less time to process applications or answer questions.

2. *Building a foundation to coordinate*

   - **Interagency outreach to promote coordination** – Agencies actively seek opportunities to coordinate regulatory approvals – such as concurrent reviews, pooled resources, or shared information or application forms – both internally and with other state and local entities.
   The benefit: By coordinating efforts, agencies can eliminate duplication or overlap in their processes.

   - **Written coordination policies and protocols** – Agencies have written policies and procedures delineating roles and responsibilities during regulatory approvals, within the agency and between it and other entities. Agencies and their partners establish avenues for communication before need arises.
   The benefit: Agreeing on policies and protocols in writing means they can be followed despite changes in staff or leadership; they also reduce confusion about roles and responsibilities.

> By 'transparent,' we mean that regulatory information is readily available and understandable to those who need it. While printed documents still fulfill the goal of transparency, the most common source today is an agency's public-facing website.

- **Consistent regulations across agencies** – Agencies establish a process for reviewing inconsistencies between their regulatory requirements and related requirements in other regulatory bodies at least every five years.
  The benefit: Eliminating conflicting regulations increases the likelihood businesses can comply with agencies' requirements and avoid delays or penalties.

3. Coordinating regulatory activities

- **Concurrent regulatory activities** – To the extent possible, agencies conduct their own regulatory reviews concurrently with other regulatory agencies, including public comment periods and coordinated inspections.
  The benefit: Conducting reviews simultaneously saves businesses time and money.

- **Interagency sharing of applicant information** – Agencies reduce duplicated work for business applicants by sharing information with other relevant agencies. Where ongoing reporting is needed, the agencies coordinate the businesses' reporting requirements to ensure they do not request duplicative information.
  The benefit: Eliminating duplicate information supplied to multiple agencies reduces the burden on businesses and increases the likelihood of consistent information across all required documentation.

- **Structured communication channels** – Agencies share agreed-upon relevant project information, such as project status and the status of regulatory approvals, on an agreed schedule.
  The benefit: Regular communication can reduce process bottlenecks and ensure a more seamless regulatory approval process for business owners.

4. Measuring results

- **Performance measures** – Agencies collect performance data related to the coordination of regulatory approvals.
  The benefit: Measuring results of coordination activities helps agencies identify successes and where improvements are necessary.

- **Performance management** – Agencies regularly analyze this performance data, share it, and use the results to improve coordination.
  The benefit: Sharing performance data allows agencies to manage process improvements individually and across agency silos.

Several multi-agency coordination efforts are already in place, and some have aligned well with leading practices

Lawmakers and agencies have invested time, money, and staff in several specific efforts to improve coordination among the state's regulatory agencies. We compared some of those efforts to leading practices in coordination.

The state has at least five well-known coordination initiatives

We evaluated five well-known initiatives that were intended to improve coordination among regulatory agencies. Four of the five we evaluated were initiated by legislation or executive direction.

Three of the well-known initiatives – the Transportation Permit Efficiency and Accountability Committee, the Shellfish Interagency Permitting team, and the Seattle Restaurant Success Initiative – applied all or most of the leading practices we identified. In particular, they included written protocols, structured communication channels, sharing of applicant information among agencies, and measuring results. They all also actively involved local jurisdictions. While those practices were the most likely to be found in the three well-known initiatives, they were also the least likely to be found in the agency coordination of the three hypothetical business projects, discussed in a later section.

Two other initiatives, the Joint Aquatic Resources Permit Application and the Integrated Project Review and Mitigation Tool, did not meet our leading practices. However, both offer lessons learned that are valuable for future interagency coordination.

More detail about each of the initiatives can be found in **Appendix D**.

Transportation Permit Efficiency and Accountability Committee (TPEAC)

Legislation brought together multiple interests and regulators to coordinate environmental permitting for Washington's transportation projects.

Leading practices

- **Interagency sharing of applicant information:** The agencies involved in TPEAC came together to develop "programmatic" permitting approaches for many frequent, routine transportation projects and activities.
- **Structured communication channels:** Federal, state and local agencies involved in TPEAC united in a Multi-Agency Permitting team to jointly resolve transportation needs, projects, and problems.
- **Written coordination policies and protocols:** Formalized their agreement with a written document.
- **Measuring results of coordination activities:** Following TPEAC, an online database allowed the Washington State Department of Transportation (WSDOT) to begin to track environmental commitments and report on compliance.

Shellfish Interagency Permitting Team (SIP)

An interagency team developed a model permitting program as part of a larger effort to restore and expand Washington's shellfish resources to promote clean-water industries.

Leading practices

- **Interagency sharing of applicant information:** The SIP team got relevant state regulators together and looked at the site drawings that each agency required. Based on that exercise, they created a master list of drawing requirements that all agencies agreed to accept.
- **Written coordination policies and protocols:** Participants in SIP signed an operational agreement laying out the goals, objectives, and team roles and responsibilities.
- **Measuring results of coordination activities:** The team measures progress and performance with a quarterly scorecard.

Seattle Restaurant Success Initiative

State, local and industry partners worked together to streamline the regulatory process of opening a restaurant in Seattle.

Leading practices

- **Written coordination policies and protocols:** State, local and industry representatives worked from a memorandum of understanding, and built working relationships to understand and resolve restaurant start-up issues.
- **Structured communication channels:** State, county and city officials met regularly to collectively find ways to respond to issues.

Joint Aquatic Resource Permit Application (JARPA)

This application form is used for multiple permits across participating federal, state and local agencies.

Lessons learned

- JARPA did not keep up with changing technologies, and one agency has rolled out an online application process to largely replace JARPA.
- JARPA never prompted agencies to share applicant information or coordinate reviews.

Integrated Project Review and Mitigation Tool (iPRMT)

iPRMT began as an effort to develop a one-stop permitting process for multiple regulatory agencies. It changed scope several times, and ultimately became EZView, a web-based platform for agencies to share information and ideas on public projects.

Lessons learned

- iPRMT participants cited the importance of consistent leadership and a clear direction. They also said the original project might have been more successful if agreement on the problem and the resources necessary to develop a solution had been reached earlier.

Our three hypothetical projects showed that agency coordination is limited

To examine the degree to which agencies are coordinating in regulatory approvals outside the state's more formal initiatives, we examined the processes in three hypothetical business projects: an assisted living facility, a restaurant with a full bar, and an inn on the waterfront with a recreation dock. We selected these types of projects based on industry growth and importance to the state, feedback from businesses, and to provide a broad representation of required regulatory approvals. The three projects involved approvals from a total of 11 state agencies, with some agencies involved in more than one project. Although not specifically evaluated as part of this audit, each project involved local and federal regulators as well. **Exhibit 2** lists the projects and the agencies they involved. A summary of the regulatory requirements for the hypothetical projects is illustrated in **Appendix E**.

Exhibit 2 – Eleven state agencies were involved in our three hypothetical business projects

Additional local and federal entities are shown in Appendix E

State agencies	Assisted living facility	Restaurant with full bar	Inn on waterfront with dock
Ecology			✓
Employment Security	✓	✓	✓
Fish & Wildlife			✓
Health	✓		✓
Labor & Industries	✓	✓	✓
Liquor Control Board	✓	✓	
Natural Resources			✓
Revenue	✓	✓	✓
Secretary of State	✓	✓	✓
Social & Health Services	✓	✓	✓
State Patrol / Fire Marshal	✓		

Source: State Auditor's Office audit fieldwork results.

We found much agency coordination is based on informal relationships rather than systematic practice

Overall, we found that, in contrast to the three successful well-known initiatives, the regulatory approval processes in the three hypothetical projects were less likely to employ leading practices, with the exception of the approvals for an assisted living facility. **Exhibit 3** summarizes the occurrence of leading practices in the three well-known initiatives versus their occurrence in the various approvals required for the three hypothetical projects.

Exhibit 3 – Many leading practices found in the well-known initiatives were not always found in approval processes within our hypothetical projects

Leading practices	Three well-known initiatives	Three hypothetical projects
Transparent regulatory requirements	✓	✓
Interagency outreach to promote coordination	✓	✗
Written policies and protocols	✓	✗
Consistent regulations across agencies	△	△
Concurrent regulatory activities	✓	✗
Interagency sharing of applicant information	✓	✗
Structured communication channels	✓	△
Performance measures	△	△
Performance management	✓	△
Local participation	✓	✗

Legend

✓ Often occurred
△ Sometimes occurred
✗ Seldom occurred

Source: State Auditor's Office audit analysis.

Our evaluation found that one important difference between the three successful initiatives and agency coordination in our three projects was the absence of structured coordination as described by the leading practices. While all the agencies requiring regulatory approvals in our projects said they make some effort to coordinate work for such projects, they also noted that some or most of the coordination is based on existing relationships between staff at the various agencies, rather than systematic practice. Agency staff described much of the coordination efforts as primarily "informal and ad hoc."

Most of the coordination in the restaurant and inn projects was informal and unstructured. Staff involved in those projects said their decisions about the need for interagency coordination are based on criteria such as the complexity of the applications or the degree of environmental impact. Furthermore, such coordination takes place largely because individuals have built relationships with staff in other divisions or agencies. State agency staff said they collaborated with staff in local jurisdictions only to the extent local entities wanted to collaborate, and not all did.

An example of a coordination opportunity
Staff at the Department of Commerce told us that while working on multi-jurisdictional streamlining projects, they have seen opportunities for additional coordination among state agencies, such as consolidating information multiple agencies send to businesses regarding quarterly filing requirements.

However, we did find some of the leading practices in those projects. For example:

Interagency sharing of applicant information: The Department of Fish and Wildlife (DFW) introduced a new online system for its Hydraulic Project Approval application in 2014 that could eventually allow other agencies to share business applicant information.

Performance management: Department of Ecology (Ecology) regularly surveys its business permit applicants; surveys include questions regarding coordination.

In comparison to the other two projects, the approvals associated with the assisted living facility project, involving three agencies, did include many of our leading practices. Washington's Department of Social and Health Services (DSHS) outsources construction review of the facilities to the Department of Health (DOH). The Washington State Patrol (WSP) conducts fire safety inspections when the construction phase is complete. The practices of these three agencies coordinating on assisted living facilities aligned well with the leading practices:

- **Written policies and protocols:** DSHS and WSP have written policies around coordinating.
- **Structured communication channels:** All three agencies participate in a quarterly coordination workgroup where the agencies meet to discuss existing and potential assisted living projects.
- **Interagency sharing of information:** Agencies discuss upcoming projects at workgroup meetings using DOH's written materials, which show, by region, projects that are likely to apply for licenses at DSHS. WSP invites local regulatory agencies to participate in its fire safety inspections.

While leading practices suggest that structured coordination is likely to be the most successful, we do not believe it is practical to ask agencies to formalize all the coordination activities they currently do informally. Nor is it necessary to coordinate on every type of approval process. Rather, efforts that are currently productive should continue, and a facilitated dialogue between regulatory agencies with input from businesses could help to identify areas where additional coordination would most benefit businesses and agencies.

As part of the dialogue to identify new opportunities to improve multi-agency coordination, agency staff need to better understand requirements in other agencies. In our evaluations, most of the agencies said they were aware of some, but not all, of the other agencies' regulatory requirements in the specific projects we reviewed. Better knowledge would give staff more information to look for coordination opportunities.

Future multi-agency efforts – prioritized around importance to the state or industry needs determined in collaboration with businesses themselves – should be established through a more formal framework from their start.

An example of a coordinated opportunity

A business needing licensing from the Liquor Control Board, Lottery and Gambling Commission would need to submit applications for separate background checks from each. Staff at one agency said they have tried in the past to consolidate the requirements, but differences in the statutes preclude them from doing so. When asked if they thought it was ultimately possible to consolidate them, staff acknowledged that it could be possible, with some changes to the relevant laws.

The state does not have a strategic approach to identify and prioritize opportunities to coordinate

While agencies do coordinate on some regulatory activities, the state has opportunities to improve and expand that coordination. By taking a more strategic approach to interagency coordination, Washington could reveal opportunities and foster practices in priority areas that can improve consistency among agencies, reduce the overall information a business must submit, and shorten the overall decision time for targeted processes.

The effort could save both businesses and government time and money. A lead agency to identify and prioritize potential opportunities could also convene regulatory agencies and facilitate the dialogue necessary to further improve coordination.

Two agencies currently play a role in efforts to help streamline regulatory processes, Washington's Department of Commerce (Commerce) and the Governor's Office for Regulatory Innovation and Assistance (ORIA). We found that neither agency, however, has been made responsible for a long-term strategic approach to regulatory coordination.

In 2013, the Legislature directed Commerce to conduct multi-jurisdictional business regulatory streamlining projects, beginning with the manufacturing sector. Commerce staff working on the project told us that, in searching for project participants, they found business and local governments reluctant to become involved in the streamlining projects, because of the cost-sharing requirements in the legislation. After some delay in finding willing participants, Commerce staff said they were able to partner with city and business representatives in Snohomish County.

Commerce is working with those partners and state agencies to create tools, such as a regulatory "path" graphic and a comprehensive multijurisdictional checklist of regulatory requirements, to help manufacturing businesses more easily navigate the regulatory process there. Commerce staff believe they have a role in additional coordination activities by providing demonstration projects and models in other jurisdictions and for various industries similar to what they are doing in Snohomish County.

Prior to the 2013 legislation, Commerce was involved in several other multi-agency collaborative efforts, such as the Seattle Restaurant Success Initiative, discussed earlier in the report. According to Commerce staff, those efforts also posed some challenges. For example, Commerce staff said that historically, state agencies have been concerned about investing their limited resources in identifying and implementing cross-agency streamlining efforts, as many agencies' leadership necessarily prioritize their existing regulatory activities to meet their core missions.

The Office of Regulatory Assistance (ORA) currently goes by the new name the Governor's Office for Regulatory Innovation and Assistance (ORIA), but has not yet requested a formal name change in statute.

ORIA is well positioned to serve as the lead agency on coordination because of its statutory role and because of its placement within the Office of the Governor, which may provide it with a greater ability to coordinate state agencies and reach out to local jurisdictions. ORIA'S current activities, however, do not include developing a statewide strategy to specifically target the identification, prioritization and facilitation of multi-agency coordination opportunities for regulatory processes.

Our audit shows agency coordination is uneven when left to generalized executive goals or informal practice. Effective coordination is far more likely when it is directed, focused and specific to a priority area. Washington does not currently have a long-term strategic approach to ensure that coordination continues to expand. No state agency has been tasked with actively looking for and prioritizing statewide opportunities for increased regulatory coordination. Because of this, Washington has missed opportunities to reduce the demand that multiple regulatory approvals place on both businesses and agencies.

Recommendations

While several coordination efforts established by lawmakers for specific industry needs have been successful, Washington does not have a lead agency, nor does it have a strategic approach to identify and prioritize new opportunities for multi-agency coordination. Much of the existing agency coordination is informal, and is based on existing relationships rather than systematic process. While we do not believe it is appropriate to ask agencies to formalize all coordination practices, a long-term, strategic approach led by a single agency would ensure ongoing coordination among regulatory agencies in priority areas, which could result in significant benefits to businesses and government.

To ensure ongoing coordination among regulatory agencies, reduce costs to government and businesses, and promote economic vitality, we recommend the Legislature assign a lead agency to:

1. Develop a long-term strategy for identifying and prioritizing multi-agency regulatory processes that can be streamlined through better coordination, based on such things as:
    - Industry needs determined in collaboration with businesses
    - Importance to the state
    - Potential for savings to businesses and agencies

2. Develop a timetable for prioritized regulatory processes to be streamlined through coordination

3. Identify agencies involved in each regulatory process to be streamlined through coordination

4. Convene agencies involved in those regulatory processes and facilitate ongoing coordination

5. Work with identified agencies on prioritized processes to:
    a. Scope and understand the problem
    b. Establish written policies and protocols for coordinating
    c. Identify structured communication channels between agencies
    d. Develop methods for sharing of applicant information between agencies to reduce duplication of what businesses need to submit, where possible
    e. Promote concurrent reviews of applicant materials or comment periods
    f. Ensure compatible regulatory requirements
    g. Develop and track performance measures

6. Report to the Governor and Legislature annually on:
    a. Progress of prioritized regulatory processes being streamlined through coordination
    b. Performance measures for each process

Agency Response

OFFICE OF FINANCIAL MANAGEMENT

Insurance Building, PO Box 43113 ● Olympia, Washington 98504-3113 ● (360) 902-0555

July 15, 2015

Ms. Jan Jutte
Acting Washington State Auditor
P.O. Box 40021
Olympia, WA 98504-0021

Dear Ms. Jutte:

On behalf of the audited agencies, thank you for the opportunity to review and respond to the State Auditor's Office (SAO) performance audit report, "Regulatory Reform: Enhancing Regulatory Agency Coordination." To provide this consolidated response, the Office of Financial Management worked with the Gambling Commission, Liquor Control Board, Lottery, Office for Regulatory Innovation and Assistance, State Patrol (WSP), and the departments of Archeology and Historic Preservation, Commerce, Ecology, Employment Security, Fish and Wildlife, Health, Labor and Industries, Social and Health Services (DSHS), and Transportation.

Governor Inslee and agency leaders are committed to continuous improvement and promoting efficiency. For some projects, regulatory coordination adds value by sharing information and streamlining the application process for businesses — resulting in cost savings for agencies and business. In other cases, agencies have learned that coordinating approval processes may add undue time and cost for business.

We appreciate the SAO acknowledging that it is not practical to ask agencies to formalize all of their coordination activities or to coordinate on every type of approval process.

We support identifying where regulatory coordination would add value and agree in concept with appointing a lead agency to develop a long-term strategy for identifying and prioritizing multi-agency processes. Such efforts — either initiated ad hoc by agencies as resources allow or through formal statute — take thoughtful consideration and resources. There also may be constraints that prevent agencies from sharing information, including laws or system limitations from legacy computers.

While the report provided helpful information about three hypothetical scenarios and five coordination initiatives, much more will need to be known to strategically prioritize the more than 1,100 regulations across the 26 state agencies that regulate Washington's dynamic and innovative business community. We appreciate the report acknowledging the regulatory coordination efforts and leading practices of Health, DSHS and WSP for assisted living facilities. However, it would have been valuable for the report to help prioritize specific processes in which more regulatory coordination would benefit businesses.

Please relay our appreciation to your staff for their time and effort on this important topic.

Sincerely,

David Schumacher
Director

cc: Joby Shimomura, Chief of Staff, Office of the Governor
Kelly Wicker, Deputy Chief of Staff, Office of the Governor
Miguel Pérez-Gibson, Executive Director of Legislative Affairs, Office of the Governor
Matt Steuerwalt, Executive Director of Policy, Office of the Governor
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David Trujillo, Director, Gambling Commission
Jane Rushford, Chair, Liquor Control Board
Bill Hanson, Director, Lottery
Jesus Sanchez, Director, Office for Regulatory Innovation and Assistance
John Batiste, Chief, Washington State Patrol
Allyson Brooks, Director, Department of Archeology and Historic Preservation
Brian Bonlender, Director, Department of Commerce
Maia Bellon, Director, Department of Ecology
Dale Peinecke, Commissioner, Employment Security Department
Jim Unsworth, Director, Department of Fish and Wildlife
John Wiesman, Secretary, Department of Health
Joel Sacks, Director, Department of Labor and Industries
Kevin Quigley, Secretary, Department of Social and Health Services
Lynn Peterson, Secretary, Department of Transportation

OFFICIAL COORDINATED AGENCY RESPONSE TO THE PERFORMANCE AUDIT ON REGULATORY REFORM: ENHANCING REGULATORY AGENCY COORDINATION

JULY 15, 2015

This coordinated management response to the State Auditor's Office (SAO) performance audit report received June 24, 2015, is provided by the Office of Financial Management, Gambling Commission, Liquor Control Board, Lottery, Office for Regulatory Innovation and Assistance, State Patrol, and the departments of Archeology and Historic Preservation, Commerce, Ecology, Employment Security, Fish and Wildlife, Health, Labor and Industries, Social and Health Services, and Transportation.

SAO Performance Audit Objectives

The SAO sought to answer these questions:

- Are state agencies currently coordinating their processes to minimize resources needed for businesses' regulatory approvals?

- Do opportunities exist for expanded coordination among Washington's regulatory agencies?

SAO Recognition 1: Leading practices used to evaluate agencies have proven success on the federal level.

SAO Recognition 2: Several multi-agency coordination efforts are already in place, and some have aligned well with leading practices.

SAO Issue 1: Three hypothetical projects showed that agency coordination is limited.

SAO Issue 2: The state does not have a strategic approach to identify and prioritize opportunities to coordinate.

SAO Recommendation 1: To ensure ongoing coordination among regulatory agencies, reduce costs to government and businesses, and promote economic vitality, we recommend the Legislature assign a lead agency to:

1. Develop a long-term strategy for identifying and prioritizing multi-agency regulatory processes that can be streamlined through better coordination, based on such things as:
   - Industry needs determined in collaboration with businesses
   - Importance to the state
   - Potential for savings to businesses and agencies

2. Develop a timetable for prioritized regulatory processes to be streamlined through coordination

3. Identify agencies involved in each regulatory process to be streamlined through coordination

4. Convene agencies involved in those regulatory processes and facilitate ongoing coordination

1

5. Work with identified agencies on prioritized processes to:
    a. Scope and understand the problem
    b. Establish written policies and protocols for coordinating
    c. Identify structured communication channels between agencies
    d. Develop methods for sharing of applicant information between agencies to reduce duplication of what businesses need to submit, where possible
    e. Promote concurrent reviews of applicant materials or comment periods
    f. Ensure compatible regulatory requirements
    g. Develop and track performance measures

6. Report to the Governor and Legislature annually on:
    a. Progress of prioritized regulatory processes being streamlined through coordination
    b. Performance measures for each process

STATE RESPONSE

We appreciate the SAO acknowledging that it is not practical to ask agencies to formalize all of their coordination activities or to coordinate on every type of approval process.

We support identifying where regulatory coordination would add value and agree in concept with appointing a lead agency to develop a long-term strategy for identifying and prioritizing multi-agency processes. Such efforts — either initiated ad hoc by agencies as resources allow or through formal statute — take thoughtful consideration and resources. There also may be constraints that prevent agencies from sharing information, including laws or system limitations such as cobalt programmed legacy computer systems.

Action Steps and Time Frame

‣ None applicable. *Directed to the Legislature.*

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Appendix A: Initiative 900

Initiative 900, approved by Washington voters in 2005 and enacted into state law in 2006, authorized the State Auditor's Office to conduct independent, comprehensive performance audits of state and local governments.

Specifically, the law directs the Auditor's Office to "review and analyze the economy, efficiency, and effectiveness of the policies, management, fiscal affairs, and operations of state and local governments, agencies, programs, and accounts." Performance audits are to be conducted according to U.S. General Accountability Office government auditing standards.

In addition, the law identifies nine elements that are to be considered within the scope of each performance audit. The State Auditor's Office evaluates the relevance of all nine elements to each audit. The table below indicates which elements are addressed in the audit. Specific issues are discussed in the Results and Recommendations section of this report.

I-900 element	Addressed in the audit
1. Identify cost savings	**Yes.** We made recommendations for improving regulatory coordination that can save agency staff time and resources.
2. Identify services that can be reduced or eliminated	**No.** We analyzed how the state could improve its interactions with businesses given the current landscape of laws and regulations. We did not look for areas where regulation should be reduced.
3. Identify programs or services that can be transferred to the private sector	**No.** This audit examined existing government efforts to coordinate and identified opportunities to improve that coordination.
4. Analyze gaps or overlaps in programs or services and provide recommendations to correct them	**Yes.** We found that the state does not currently have a strategic approach for improving regulatory coordination and many agencies do not have policies or procedures for ensuring effective coordination.
5. Assess feasibility of pooling information technology systems within the department	**No.** Although this audit did not directly examine information technology systems, we found that coordination could be improved through increased communication between agencies. This communication could be achieved through improvements to IT systems.
6. Analyze departmental roles and functions, and provide recommendations to change or eliminate them	**Yes.** We found that individual agencies currently conduct some regulatory coordination activities, although it can be informal or ad hoc. We recommend that the state assign a lead agency to develop a strategy and prioritize opportunities for improving coordination.
7. Provide recommendations for statutory or regulatory changes that may be necessary for the department to properly carry out its functions	**Yes.** We found that statutory changes would likely improve long-term coordination efforts around regulatory approvals for businesses.
8. Analyze departmental performance, data performance measures, and self-assessment systems	**Yes.** We found that many agencies do not measure their performance related to regulatory coordination. This missing data should be gathered by the lead agency designated by the Legislature.
9. Identify relevant best practices	**Yes.** Our audit criteria and the analysis of existing successful coordination efforts represent best practices in regulatory coordination. Our recommendations reflect these best practices.

Appendix B: Methodology

This performance audit evaluated regulatory agencies' activities related to coordination with other state and local agencies for approving or denying business project applications. Research for the report centered on the following two questions:

- Are state agencies currently coordinating to minimize resources needed for businesses' regulatory approvals?
- Do opportunities exist for expanded coordination among Washington regulatory agencies?

Our analysis focused on well-known coordination initiatives that were already underway, and on three hypothetical business projects requiring approvals by multiple agencies. Our examination of coordination with local jurisdictions was limited to what we learned from state agencies about the coordination that occurs with relevant local agencies. We did not explicitly include an evaluation of those local regulatory agencies, as it was outside the scope of this audit.

To conduct our analysis, we relied on leading practices from state and federal agencies as well as from performance audits conducted by the U.S. Government Accountability Office. We developed a coordination evaluation tool that included leading practices in the following four areas:

1. **Communicating multi-agency requirements**
2. **Building a foundation to coordinate**
3. **Coordinating regulatory activities**
4. **Measuring results of coordination**

Details of the evaluation criteria contained in the coordination evaluation tool can be found in **Appendix C**.

Evaluation of well-known regulatory coordination initiatives

We evaluated the following well-known current and past coordination initiatives against leading practices in coordination:

- Transportation Efficiency and Accountability Committee
- Seattle Restaurant Success Initiative
- Shellfish Interagency Permitting team
- Joint Aquatic Resource Permit Application
- Integrated Project Review and Mitigation Tool

To learn about the initiatives, we gathered information through interviews with participating staff, laws and regulations, websites, reports, and policies and procedures. We looked for commonalities in the origins of the projects, types of successful products, leading practices, and challenges or barriers to collaborating. In addition, we assessed the degree to which these projects met the audit criteria listed in **Appendix C**. We then compared these results to those of the example business projects, looking for major differences in coordination activities. Together, these results helped to inform recommendations about how state agencies should best go about coordinating in the future and the areas they should most try to improve upon.

Regulatory activity evaluations

To determine whether agencies are currently coordinating regulatory approvals, we evaluated the regulatory activities related to three example business projects. We selected the following three business projects based on several factors: industries in Washington with high growth rates, feedback from business owners, a diverse representation of industries, and a broad representation of regulatory agencies and required permits and licenses. Based on those factors, we selected the following business projects:

- Assisted living facility
- Restaurant with a full bar
- Inn on the waterfront with a recreation dock

For these business projects, we identified each regulatory approval and activity a business must complete to open and operate in Washington State. Based on that information, we were able to determine all of the state and local agencies involved in the approval processes.

We developed a questionnaire to learn more about the coordination activities of relevant state agencies, and sent each of the agencies questionnaires related to the projects they were involved in. These questionnaires also provided an opportunity for agencies to answer open-ended questions about their coordination processes. Where necessary, we followed up with agency staff to learn more about the details of their efforts as they relate to our audit criteria.

We compared the information gathered from questionnaires, interviews and websites to our criteria to determine the extent to which agencies use leading practices for coordinating regulatory approvals, and where there might be opportunities for additional coordination. Although the circumstances and regulatory activities for each example business project are unique, we looked for commonalities between them to inform our recommendations.

Appendix C: Coordination Leading Practices

Communicating multi-agency requirements

Criteria	Transparent regulatory requirements
Definition	Does the agency provide sufficient information online to help a business understand the regulatory requirements and which other agencies are involved in approvals for a particular business project?
Objective	To reduce the time and money businesses spend trying to understand what regulatory approvals their projects require and what regulatory agencies are involved in the process. It can also reduce the time and money agency staff spend answering businesses' questions.
Best practices	Website provides regulatory requirements by industry or project type. Website provides links or information about requirements in other agencies. Website provides meaningful access for applicants, such as translation of regulatory requirements in industries that have high concentrations of business owners with limited English proficiency.

Coordination framework

Criteria	Interagency outreach to promote coordination	Written policies and protocols	Consistent regulations across agencies
Definition	Does the agency actively seek opportunities to coordinate the approval process within its agency and with other state and local agencies?	Do the agencies have formalized policies or protocols about coordinating their regulatory processes?	Does the agency ensure that its regulatory requirements are not in conflict with other state and local agencies' requirements?
Objective	Because business projects require a mix of state, local, and federal regulatory approvals, coordination of those processes can help to eliminate duplication and overlap, and to ensure the overall regulatory process is as streamlined as possible.	Written policies and protocols ensure they will be followed despite changes in staff or leadership.	Businesses cannot be in compliance with conflicting regulatory regulations or requirements, and non-compliance results in delays, penalties, and fees.
Best practices	Agency has a process to determine whether there are opportunities to coordinate regulatory approvals within its agency and with other state and local entities, such as concurrent activities, pooled resources, or shared information or application forms.	Agency has written policies or procedures containing the delineation of roles and responsibilities within the agency and between it and other state and local entities while coordinating the regulatory approvals of the particular project types. Agency has established avenues for communication between coordinating entities.	Agency has a process for periodically reviewing inconsistencies between its regulatory requirements and related requirements in other state and local agencies Agency has actively reviewed consistency with regulatory requirements of other state and local agencies within the past five years.

Coordinating regulatory activities

Criteria	Concurrent regulatory activities	Interagency sharing of applicant information	Structured communication channels
Definition	Does the agency conduct regulatory approvals simultaneously within its own divisions and with other state and local regulatory entities where possible?	Does the agency seek out and identify business information that can be shared between agencies to reduce the burden on businesses or shorten the approval time?	Does the agency regularly communicate among interagency divisions and with other regulatory agencies to ensure seamless regulatory approval processes?
Objective	Conducting work simultaneously saves businesses time and money waiting for regulatory approvals and minimizes the disruption to businesses.	Avoiding duplication of information can reduce the burden on businesses of filling out the same information multiple times and can reduce the overall approval time.	Communication among regulatory agencies helps to avoid process bottlenecks and delays.
Best practices	Agency conducts regulatory reviews concurrently with other regulatory agencies, including public comment periods, when possible. Agency coordinates inspections with other regulatory agencies.	Agency provides a way for the business information to be shared with other relevant regulatory entities without the need for the business to duplicate the information. Agency coordinates the business' reporting requirements to ensure no duplication of reported information is required.	Agency communicates among divisions and with other regulatory entities on relevant project information such as project status and the status of regulatory approvals.

Measuring coordination

Criteria	Performance measures	Performance management
Definition	Does the agency have measures to ensure that coordinated efforts are successful, and to identify where additional coordination may be needed?	Does the agency engage in process improvement to develop strategies to improve or expand regulatory coordination?
Objective	Performance measures provide the necessary information to help agencies know if and where improvements are necessary.	Performance management helps agencies to identify ways in which to improve its performance and provides the opportunity to discuss regulatory goals.
Best practices	Agency regularly collects performance data related to the coordination of regulatory approvals.	Agency regularly analyzes performance and uses results to improve coordination.

Appendix D: Washington's Coordination Initiatives

This appendix provides some background information about the five coordination initiatives mentioned throughout this report.

The five coordination initiatives

Transportation Permit Efficiency and Accountability Committee (TPEAC)

In the late 1990s, the Washington State Department of Transportation (WSDOT) faced numerous federal laws, state statutes, local ordinances, and the treaty obligations of 28 Native American tribes to permit the state's transportation projects, at the same time a voter-passed initiative eliminated the motor vehicle excise tax and substantially reduced transportation funding. In 2001, the Legislature created the Transportation Permit Efficiency and Accountability Committee (TPEAC) to help ease the problem by seeking ways to reduce the time and cost of permitting.

The greatest success of TPEAC was the dialog that resulted when various agencies and groups came together for the first time to collaborate and work out transportation needs, projects and problems. Through TPEAC, state legislators, state, local and federal agencies, city, county and business associations, the construction industry, and environmental, labor, and tribal interests convened to coordinate environmental permitting for Washington's transportation projects.

TPEAC's efforts resulted in several significant and lasting achievements:

- Federal, state and local agencies united in a Multi-Agency Permitting (MAP) team to jointly resolve transportation needs, projects, and problems.
- Agencies came together to develop "programmatic" permitting approaches for many frequent, routine transportation projects and activities.
- WSDOT developed compliance guidance, tools, and training for its employees and its partners.
- An online database allowed WSDOT to begin to track environmental commitments and report on compliance.

Federal, state and local agencies united in a MAP team to jointly resolve transportation needs, projects, and problems.

Regulatory agencies formed a MAP team to increase communication and coordination between permitting agencies that became the model for future MAP teams. Beginning in November 2003, regulatory staff from the Army Corps of Engineers, WSDOT, Washington's Departments of Ecology and Fish and Wildlife, and the King County Department of Development and Environmental Services started regularly working together in the same office space, increasing communication and coordination across agencies and finding ways to better maintain planned schedules and budgets. WSDOT provided the necessary management, funding and oversight required to establish and maintain the team. The MAP team worked together on more than 110 transportation projects over a ten-year time span.

The effort was so successful, in 2010 the Legislature authorized optional multi-agency permitting teams for business projects modeled after TPEAC's MAP team. In 2013 the MAP team combined with the WSDOT Liaison program, another permit streamlining opportunity that resulted through TPEAC.

The WSDOT Liaison program, still underway with some agencies, provides staff dedicated to transportation projects at various regulatory agencies. Some liaisons are WSDOT staff members based within the regulatory agency, while others are regulatory agency staff members dedicated to WSDOT through interagency agreements. The liaisons work with WSDOT on early project coordination, processing permits for transportation projects, Endangered Species Act consultations, as well as project and policy support.

Agencies came together to develop "programmatic" permitting approaches for many frequent, routine transportation projects and activities

Another significant outcome of TPEAC was the development of programmatic permitting approaches, allowing a single permit to cover frequent, routine activities conducted at different locations.

Under TPEAC, multiple agencies and groups, including the National Oceanic and Atmospheric Administration, the United States Fish and Wildlife Service, the Army Corps of Engineers, the Washington State Department of Ecology (Ecology), the Washington State Department of Fish and Wildlife (DFW), local agencies and tribal representatives worked together to develop ten programmatic permits. They included permits for such activities as bridge structure repair, culvert maintenance, and pile replacement in marine waters, to name just a few. WSDOT has gone on to develop programmatic Endangered Species Act consultations with US Fish and Wildlife Service and National Marine Fisheries Service.

For WSDOT alone, the use of these programmatic permits between 2009 through 2013 saved almost 17,000 staff hours (the equivalent of 1.6 full time employees).

WSDOT developed compliance guidance, tools, and training for its employees and partners

TPEAC sought to improve permit compliance by adopting clear reporting procedures for construction and operations managers. TPEAC also funded training of more than 2,000 staff members in understanding environmental laws, as well as best management practices for fieldwork, conflict resolution, environmental compliance and permit compliance.

TPEAC's efforts resulted in WSDOT's Environmental Procedures Manual to help its staff navigate the regulatory environment. The manual is still in use over ten years later. It includes guidance on where to find information for all federal, state and local permits and approvals, procedures to identify necessary permits, as well as mitigation and avoidance opportunities, and suggestions of ways to coordinate with staff at other state agencies early in the process. In 2008, WSDOT added detailed guidance to improve the quality of its permit applications to increase the chance each application will be considered complete the first time it is reviewed.

An online database allowed WSDOT to begin to track environmental commitments and report on compliance

WSDOT developed a system to track the environmental requirements on its projects. In subsequent years, WSDOT updated the system to track non-compliance issues. WSDOT uses this data to identify trends for annual reporting in its *Gray Notebook* and to document lessons learned.

Seattle Restaurant Success Initiative

The Seattle Restaurant Success Initiative is a public-private partnership between the city of Seattle, state of Washington, King County and the Washington Restaurant Association to help streamline restaurant permitting in Seattle. The initiative was developed in collaboration with more than 17 agencies and organizations, and resulted from efforts by the Department of Commerce and the city of Seattle to make the regulatory environment easier for businesses to start, remain open, and grow. Initiative partners identified restaurant licensing as both one of the most requested and one of the most complex regulatory processes.

Two separate but parallel regulatory streamlining efforts at the state level and in Seattle, initiated by different directives, eventually coalesced when both encountered similar goals and objectives. In 2013, the city of Seattle, King County, the Washington state Office of Regulatory Innovation and Assistance (ORIA) and Commerce entered into a Memorandum of Understanding (MOU) with the following primary goals:

1. Convene a core multi-agency, cross-jurisdictional team.

2. Identify and help implement process improvements, including resolving conflicting, overlapping, and/or confusing requirements.

3. Develop an online guide to assist businesses with the process of opening a restaurant.

4. Develop and implement communication, outreach and evaluation.

The four government partners worked with additional state agencies, including the Liquor Control Board (LCB), and also involved the Washington Restaurant Association to participate in the project to provide industry perspective. While the MOU expired at the end of 2014, program participants reported that they intend to continue to work together.

The Seattle Restaurant Success Initiative resulted in several significant products and practices:

- Project participants began their process with business input to help develop tools that would effectively communicate complex and confusing regulatory information

- Commerce and the city of Seattle developed a comprehensive online guide for navigating the city, county and state regulations involved in opening and operating a restaurant in Seattle

- A newly created liaison position in Seattle's Office of Economic Development provides dedicated customer service and technical assistance to prospective restaurateurs

- State, local and industry representatives worked from an MOU and built working relationships to understand and resolve restaurant start-up issues

- State, county, and city officials met regularly to collectively find ways to respond to issues.

Project participants began their process with business input to help develop tools that would effectively communicate complex and confusing regulatory information.

Prior to and during project development, input from the restaurant industry guided project design and the development of tools and products. Commerce and the city of Seattle gathered input through:

- Interviews with 20 restaurant owners and operators

- Focus group discussions with restaurant consultants

- Compilation and analysis of start-up times for 50 Seattle restaurants

- One-on-one discussions with the Washington Restaurant Assocation and other industry experts, prospective restaurateurs, and regulatory agency representatives

- Lean process mapping of seven state requirements for restaurant start ups

Commerce and the city of Seattle developed a comprehensive online guide for navigating the city, county and state regulations involved in opening and operating a restaurant in Seattle.

At the center of the group's outreach efforts is a website that provides a roadmap to navigate potential restaurateurs through the process of opening a restaurant in Seattle. The website provides step-by-step information, including materials for planning, all permitting and licensing requirements, and examples and worksheets. Some materials, including the roadmap, are available in English, Spanish and Chinese.

Commerce is currently adapting the tools developed in the Seattle Restaurant Success Initiative for use in other cities. Commerce is branding this approach "Regulatory Roadmaps" and intends to make the templates and tools available to local jurisdictions across the state, and then develop similar approaches for other sectors.

A newly created liaison position in Seattle's Office of Economic Development provides dedicated customer service and technical assistance to prospective restaurateurs.

The city of Seattle created a restaurant liaison position to provide additional, cross-departmental support to businesses navigating the rules and requirements around opening a restaurant. City officials expect the new position will facilitate a better flow of information between the city and restaurant community.

State, local and industry representatives worked from an MOU and built working relationships to understand and resolve restaurant start-up issues.

Participants reported that having a clear charter outlining the participants' responsibilities and project goals is crucial to project success. Additionally, project participants reported that they found fostering working relationships that cross government jurisdictions, commitment from executive leadership, and getting a clear understanding of the problem with its context were key to the project's success.

State, county and city officials met regularly to collectively find ways to respond to issues.

By meeting on a regular basis, project participants were able to find solutions to problems identified by restaurant owners. For example, the city and the LCB worked together to resolve a perceived conflict in railing height regulations. In addition, project participants reported they have proposed a rule change to LCB making it easier for restaurants to have seasonal outdoor seating. If adopted, this rule change would benefit all restaurants in the state.

Washington's Shellfish Interagency Permitting Team (SIP)

In late 2011, Governor Gregoire created the Washington Shellfish Initiative to bring together federal and state government agencies, tribes, and the shellfish industry to restore and expand Washington's shellfish resources. The initiative came on the heels of the national Shellfish Initiative, launched six months earlier at the federal level to help increase populations of shellfish in the nation's coastal waters.

One important aspect of Washington's Shellfish Initiative was the creation of the Shellfish Interagency Permitting (SIP) team, tasked with creating a "model permitting program" to improve the timeliness of permit decisions while ensuring regulatory compliance. The SIP team consists of agencies with direct regulatory or oversight roles of the industry, as well as tribes and state and federal agencies with only indirect roles. ORIA coordinated and facilitated meetings until participants created an operational agreement, then stepped back and allowed the SIP team to manage itself.

The objectives of the SIP team were to:

- Identify and address permitting obstacles
- Expand permitting coordination and increase predictability
- Improve interagency accessibility and applicant relationships
- Ensure high quality environmental outcomes

The initiative resulted in a number of noteworthy practices:

- Participants signed an operational agreement laying out the goals, objectives, and team roles and responsibilities.
- The SIP team mapped the steps to opening a shellfish aquaculture operation.
- Participants in the SIP team committed to coordinate on each permitting process.
- The SIP team created a master list of required drawing requirements, accepted by all permitting agencies.
- The team measures progress and performance with a quarterly scorecard.

Participants signed an operational agreement laying out the goals, objectives, and team roles and responsibilities

Through an operational agreement, team members committed to see the process of developing a model permitting program through to completion. They agreed to provide timely comments on documents, and to report all relevant information to the team.

The SIP team mapped the steps to opening a shellfish aquaculture operation

The team's first achievement in developing a model permitting program was to identify all the steps a shellfish grower would need to take to start a business in Washington. The initial mapping took a year to complete. The team recognized that without coordination between the various entities involved, a permit applicant would need to seek approval from each agency separately in succession, potentially resulting in re-work, lost time, and other inefficiencies.

The team also developed a narrative to accompany the process chart, describing the steps for receiving an aquaculture permit in detail and providing links to all relevant information. This information, along with the map, is now available on the team's website.

Participants in the SIP team committed to coordinate on each permitting process

Rather than making substantial changes to each agency's permitting process, the participating agencies elected instead to commit to fully coordinate each permitting process when requested by an applicant from beginning to end, ensuring that all agencies make consistent and coordinated decisions.

As a result of this coordinated approach, applicants who seek assistance from the SIP team attend fewer meetings with regulatory agencies to discuss their applications, saving both time and money for themselves and the regulatory agencies.

The SIP team created a master list of required drawing requirements, accepted by all permitting agencies

As a result of the process mapping, the SIP team identified several different types of drawings or maps required by multiple agencies from permit applicants. The team developed a complete list of all drawing requirements, identified the similarities, and created a single master list. All agencies agreed to accept drawings that adhere to the standards outlined in the master list and not request any additional drawings.

The team measures progress and performance with a quarterly scorecard

The SIP team works with the Puget Sound Partnership to develop target completion dates for various stages of each permitting project and to ensure the projects stay on their projected timelines.

Joint Aquatic Resources Permit Application (JARPA)

The Joint Aquatic Resources Permit Application (JARPA) is a single application form accepted by several state, federal and local government entities for a variety of permits and has been in use in Washington since 1995. JARPA is designed to simplify the permit process for applicants proposing construction, fill placement, public access impingement and other development activities in or near aquatic environments and wetlands by allowing permit applicants to complete only one form to be submitted to the necessary permitting agencies.

JARPA offers:

- A single application form for permits administered by federal, state, and local agencies
- Consistent language and terms between multiple agencies

JARPA is a single application for permits administered by federal, state, and some local agencies, and can be used to apply for permits administered by:

- U.S. Army Corps of Engineers (Corps)
- U.S. Coast Guard
- Department of Ecology
- Department of Fish and Wildlife (DFW)
- Department of Natural Resources (DNR)
- Participating local jurisdictions

JARPA provides consistent language and terms between multiple agencies

JARPA is written in plain talk while retaining necessary technical language. The website that links to the JARPA application has an online glossary with definitions of technical terms. In addition, the electronic application form has a help screen feature for each application question. Most important, JARPA provides consistent language between the multiple agencies that will be reviewing the application.

Although the JARPA was a promising beginning for coordinated environmental permits, the effort has not kept pace with the needs of businesses or changing technology, and it has not successfully brought agencies together to coordinate regulatory reviews.

JARPA's application technology has not advanced

The JARPA form is currently 14 pages long and can be downloaded online from any of the participating entities' websites as well as from ORIA. Applicants must fill out and submit an application (either through email or mail) separately to each regulatory entity from which they require a permit. When agencies receive a JARPA application, they input the data manually into their systems and scan copies of the paper applications for their records. Agencies report that some permit applicants do not understand that their applications must be separately sent to each regulatory agency, causing delays and confusion as the project moves forward. A single online application submission would reduce applicant confusion and manual data input on the part of agencies. However, agencies have determined that their internal systems are too different to facilitate a single submission.

Agencies did not achieve concurrent reviews

One of the original intentions behind the JARPA was to allow for concurrent application reviews. However, resource limitations have prohibited the full use of concurrent reviews. For example, an applicant that applies for a Section 404 from the Corps must also receive a Section 401 Water Quality Certification from Ecology. It is possible for the Corps to issue a permit that would not need Ecology review. For that reason, Ecology waits to begin its application review until after the Corps has made a decision and the department requirement to respond within a year only begins after the Corps' decision is made.

DFW is moving away from JARPA and using a new application system

Permit applications for hydraulic permit approvals are one of the most common requests through JARPA, but DFW found that its information needs were different than those supplied on the JARPA. In addition, DFW's existing system was aging and it faced legislative requirements for its system to have a public viewing component.

In response, DFW launched its new Aquatic Protection Permitting System (APPS) in May of 2014. While the system is still new, DFW reported that expected benefits include:

- Lessen the burden on applicants

- Increase DFW employee efficiency

- Allow greater transparency for the public

Although DFW continues to accept JARPA forms, it prefers that applicants use the new online system. APPS was designed to address DFW's specific needs and does not generate the information other agencies require for their permit reviews.

The APPS system could be the first step in the unraveling of the coordination achieved through JARPA. Although DFW designed APPS so that other agencies could tie in later, those agencies have not taken advantage of this opportunity. As a result, businesses must now fill out a hydraulic permit application through DFW as well as a JARPA to receive permit approvals for complex environmental projects.

The Integrated Project Review & Mitigation Tool (iPRMT)

In 2007, the Legislature allocated funding to the Association of Washington Cities (AWC), the Washington State Association of Counties (WSAC), and ORIA to support the development of a one-stop permitting process for federal, state, and local agencies. Representatives from state and federal agencies, cities and counties formed the Integrated Project Review and Mitigation Tools Initiative (iPRMT) to develop a coordinated and consistent process to evaluate permit applications. iPRMT members signed an interagency agreement to:

- Align best practices for project design and mitigation among environmental agencies
- Build an online "integrated decision support tool" to tie best practices to specific activities and allow for multi-agency communication and coordination
- Establish agreements for ongoing coordination

Over the next five years, the scope of the project changed several times. By 2009, published descriptions described iPRMT as a place where applicants could complete and submit JARPA, and agency staff could review and comment on applications. By 2012, participants had again revised expectations, and ultimately created EZview, a web-based platform for public projects allowing regulatory agencies to upload and share information, comment on proposals, set up meetings, and share ideas.

Project participants gave varying reasons for the changes in scope, but all agreed they reached a point where they recognized they could not solve the problems associated with achieving the original goals. For example, participants said that once they mapped the decision-making rules for each of the agencies involved, they realized that the process was too complex to capture in a single schematic and the project's scale changed from an integrated resource management tool to an applicant tool.

In addition, individual agency computer systems were not able to share information with one another and the amount of resources needed to allow those systems to communicate would have been significant.

Participants in the iPRMT initiative identified several lessons learned from the project. They noted the following elements were lacking from the project, and would have likely increased the likelihood of its success:

- Consistent leadership and a clear direction
- Efficient agency processes
- Upfront agreement on the problem and the resources necessary to develop a solution.
- Limited project scope
- Early integration of agency information technology staff

A coordinated project needs consistent leadership and a clear direction

Participants noted that consistent leadership throughout the project, committed funding, and a clear direction that includes an understanding of the feasibility of the project are crucial to project success.

Coordinating agencies should agree up front on the problem and the resources necessary to develop a solution

Participants in iPRMT began the work before they fully understood the difficulty of developing computer programs that could replicate extremely complex permit decision-making.

Agencies need efficient internal processes to streamline through coordination

Participants noted that agencies need to have efficient internal regulatory processes before they can work together to develop a coordinated process to evaluate permit applications. They agreed that some of the permit processes they were trying to incorporate needed to be streamlined by the agencies.

The project should have had a more limited scope

Participants agreed that the team's design of the original project was too large in scope, trying to include too many approvals from too many agencies. They said they believe that restricting the size of the project scope would have helped iPRMT be successful.

The project should have integrated agency information technology (IT) staff sooner

Participants realized they needed to work with agency IT staff earlier in the project to better understand how to integrate the various agencies' systems.

Appendix E: Hypothetical Business Projects

This appendix illustrates the regulatory paths required for the three hypothetical business projects mentioned throughout this report.

Three hypothetical business projects

Regulatory path for a business to establish an assisted living facility

Company A

1. SET-UP

Secretary of State
- ✓ Register business

Revenue
- ✓ Submit business license application (BLS)

Labor & Industries
- ✓ Establish account
- ✓ Write Accident Prevention Plan to address safety concerns

Employment Security
- ✓ Establish account

Social & Health Services
Economic Services Administration
- ✓ Establish an account
- ✓ Report all new hires to Child Support Division

Local Agencies
- ✓ Apply for local business license
- ✓ Register with city/county

2. PRIOR TO OPENING

Local Agencies
- ✓ Apply for local building and health permits
- ✓ Apply for Food Service Establishment Permit
- ✓ Other local permits, licenses and inspections as necessary

Social & Health Services
Residential Care Services
- ✓ Apply for Assisted Living Facility License
- ✓ Meet with DSHS to discuss plan for meeting requirements
- ✓ Address issues, undergo inspections

Labor & Industries
- ✓ Apply for Electrical Work Permit
- ✓ Undergo Electrical inspection
- ✓ Apply for Boiler/Pressure Vessel Installation Permit
- ✓ Undergo Boiler/Pressure Vessel Installation inspection
- ✓ Apply for Elevator Permit
- ✓ Undergo Elevator Permit inspection

Health
- ✓ Apply for Assisted Living Facility Plan review
- ✓ Receive list of issues of noncompliance with building codes and discuss how to meet requirements
- ✓ Re-submit plans as necessary

Washington State Fire Marshal
- ✓ Undergo inspection
- ✓ Receive list of fire and life safety deficiencies
- ✓ If necessary, undergo additional inspections

Liquor Control Board
- ✓ Apply for Liquor Permit

3. ON-GOING OPERATIONS

Local Agencies
- ✓ Pay local taxes
- ✓ Renew Food Service Establishment Permit
- ✓ Ensure employees handling food have received training

Liquor Control Board
- ✓ Renew Liquor Permit

Social & Health Services
Economic Services Administration
- ✓ Report all new hires within 20 days

Employment Security
- ✓ File wage reports
- ✓ Pay unemployment insurance tax

Revenue
- ✓ Pay state taxes
- ✓ Renew registration as a corporation (BLS)

Labor & Industries
- ✓ Submit quarterly reports
- ✓ Undergo Conveyance inspections
- ✓ Undergo Boiler/Pressure Vessel inspections

Washington State Fire Marshal
- ✓ Undergo annual fire and life safety inpections

Social & Health Services
Residential Care Services
- ✓ Renew license
- ✓ Undergo ongoing facility and provider licensing inspections
- ✓ Apply for change in bed capacity or remodel permits as needed
- ✓ Apply for contracts with DSHS to serve clients receiving Medicaid (optional)

Assisted living facility

ASSISTED LIVING

Regulatory path for a business to establish a restaurant with a full bar

1. SET-UP

Company B

Secretary of State
- ✓ Register business

Revenue
- ✓ Submit business license application (BLS)
- ✓ Submit Liquor License Addendum

Labor & Industries
- ✓ Establish account
- ✓ Write Accident Prevention Plan to address safety concerns

Employment Security
- ✓ Establish account

Social & Health Services
Economic Services Administration
- ✓ Establish an account
- ✓ Report all new hires to Child Support Division

Local Agencies
- ✓ Apply for local business license
- ✓ Register with city/county

2. PRIOR TO OPENING

Local Agencies
- ✓ Apply for Food Service Establishment Permit
- ✓ Ensure permitted use is up-to-date and location's Certificate of Occupancy meets needs
- ✓ Apply for structural, electrical, plumbing, or mechanical modification permits
- ✓ Other local permits, licenses and inspections as necessary

Liquor Control Board
- ✓ Phone interview with liquor investigator
- ✓ Submit requested materials within 15 days of phone interview
- ✓ Post location, noting any church, school or public institution within a 3 block radius
- ✓ Receive final inspection
- ✓ Modify physical space as identified in final inspection
- ✓ Complete on-line briefing

Labor & Industries
- ✓ Apply for Electrical Work Permit
- ✓ Receive electrical inspection
- ✓ Apply for Boiler/ Pressure Vessel Installation Permit
- ✓ Receive Boiler/Pressure Vessel inspection

3. ON-GOING OPERATIONS

Local Agencies
- ✓ Pay local taxes
- ✓ Renew Food Service Establishment Permit
- ✓ Document employees handling food have received training

Social & Health Services
- ✓ Report all new hires within 20 days

Labor & Industries
- ✓ Submit quarterly reports
- ✓ Renew Boiler/Pressure Vessel Certificate
- ✓ Receive Boiler/Pressure Vessel Inspections

Revenue
- ✓ Pay state taxes
- ✓ Renew registration as a corporation (BLS)

Employment Security
- ✓ File wage reports
- ✓ Pay unemployment insurance tax

Liquor Control Board
- ✓ Renew Retail Liquor License
- ✓ Ensure employees have MAST training

Restaurant with full bar

RESTAURANT

Regulatory path for a business to establish an inn on the waterfront with a recreational dock

1. SET-UP

Company C

Secretary of State
- ✓ Register business

Labor & Industries
- ✓ Establish account
- ✓ Write Accident Prevention Plan to address safety concerns

Social & Health Services
Economic Services Administration
- ✓ Establish an account
- ✓ Report all new hires to Child Support Division

Revenue
- ✓ Submit business license application (BLS)

Employment Security
- ✓ Establish account

Local Agencies
- ✓ Apply for local business license
- ✓ Register with city/county

2. PRE-CONSTRUCTION

Fish & Wildlife
- ✓ Apply for Hydraulic Project Approval Permit (JARPA or APPS):
  - *Submit plans for project*
  - *Demonstrate compliance with SEPA*

Army Corp of Engineers
- ✓ Submit JARPA

Local Agencies
- ✓ Complete SEPA checklist
- ✓ Apply for building permits
- ✓ Apply for Shoreline permits
- ✓ Apply for Critical Area permit
- ✓ Other local requirements as necessary

Natural Resources
- ✓ Apply for lease on state-owned aquatic land
  - *Provide land site survey*

Ecology
- ✓ Submit JARPA
- ✓ Submit Notice of Intent to Construct a Well
- ✓ Complete Coastal Zone Determination of Consistency:
  - *Submit detailed description of activity & information on approved permits*
  - *Demonstrate compliance with SEPA*
- ✓ Apply for Construction Stormwater General Permit:
  - *Prepare Stormwater Pollution Prevention Plan*
  - *Demonstrate compliance with SEPA*
  - *Publish two public notices*

3. CONSTRUCTION

Labor & Industries
- ✓ Apply for Electrical Work Permit
- ✓ Undergo Electrical inspection
- ✓ Apply for Boiler/Pressure Vessel Installation Permit
- ✓ Undergo Boiler/Pressure Vessel Installation inspection
- ✓ Apply for Elevator Permit
- ✓ Undergo Elevator Permit inspection

Ecology
- ✓ Implement stormwater best management practices to prevent pollution
- ✓ Sample weekly, monitor & record
- ✓ Conduct site inspection weekly & within 24-hours of any discharge from the site
- ✓ Report monthly on water quality
- ✓ At completion, submit Well Report Form

4. POST-CONSTRUCTION

Health
- ✓ Apply for Transient Accommodation License
- ✓ Undergo inspection

5. ON-GOING OPERATIONS

Local Agencies
- ✓ Pay local taxes

Social & Health Services
Economic Services Administration
- ✓ Report all new hires within 20 days

Revenue
- ✓ Pay state taxes
- ✓ Renew registration as a corporation (BLS)

Employment Security
- ✓ File wage reports
- ✓ Pay unemployment insurance tax

Labor & Industries
- ✓ Submit quarterly reports
- ✓ Renew Elevator Operating Certificate
- ✓ Undergo Conveyance inspection
- ✓ Renew Boiler/Pressure Vessel Certificate
- ✓ Undergo Boiler/Pressure Vessel inspections

Health
- ✓ Renew Transient Accommodation License
- ✓ Undergo ongoing inspections

Natural Resources
- ✓ Renew lease

Inn on the waterfront with a dock

INN