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PUBLIC HEALTH AND SOCIAL SERVICES DEPARTMENT

July 6, 2017

Schelli Slaughter, Director Rachel C. Wood, MD, MPH Health Officer

Tami Ramsey Department of Ecology Waste 2 Resources Program PO Box 47600 Olympia, WA 98504-7600

Subject: Support for Proposed Revisions to Chapter 173-312 WAC and 173-313 WAC, Coordinated Prevention Grants and Local Solid Waste Enforcement Grant Regulation

Dear Ms. Ramsey,

I support the proposed revisions to Chapter 173-312 WAC and 173-313 WAC. The proposed changes clarify the intent of the solid waste financial assistance program, identify clear priorities for the program, update relevant code sections, and repeal outdated Chapter 173-313 WAC.

The proposed amendments to funding allocation are needed and appropriate. Assuring solid waste is properly managed is a core public health function. The only funding many jurisdictional health departments have for solid waste enforcement activities is financial assistance provided by the state. The funding mechanism in current code will not provide sufficient solid waste enforcement funding for some health jurisdictions when levels of state solid waste financial assistance are low. While the proposed fund distribution method would reduce funding for solid and hazardous waste planning and implementation activities slightly below 80 percent, this only occurs when state funding is less than \$13,125,000 per biennium. While this seems likely for FY 2017-19, it is the first time, and hopefully the last time, solid waste funding will be so low. Conversely, the proposed code provides a way to efficiently redistribute unallocated solid waste enforcement funds when higher levels of financial assistance are provided.

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I understand our partners that manage solid waste facilities have concerns with some proposed revisions and fund distribution section. If this rule process continues, I will be happy to work with Ecology and solid waste facility representatives to try to come up alternatives that are satisfactory to all parties.

Thank you for considering my comments. Please contact me if you have questions or if I can be of assistance.

Sincerely,

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Art Starry, R.S. Environmental Health Division Director Thurston County Public Health and Social Services