

Spokane County

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June 27, 2017

RECEIVED

Tami Ramsey
Department of Ecology
Waste 2 Resources Program
300 Desmond Dr.
Lacey, WA 98503

JUL 05 2017

Ecology W.2R

RE: CPG Funding and Ecology's Rule Update

Spokane County is sending this letter to express concern with respect to the Coordinated Prevention Grant (CPG) program funding and Ecology's associated rulemaking of WAC 173-312 and 313. The appropriation of CPG statewide funding been drastically reduced from \$28 million to \$10 million in the last three grant cycles. This has a significant impact on the implementation of Spokane County's state mandated Solid Waste and Moderate Risk Waste Plan as well as our ability to continue providing the associated programs and services to our citizens. In addition, the current rulemaking creates even more burden on the County for Solid Waste programs and services. Spokane County formally submits the following comments to Ecology's proposed rulemaking regarding WAC 173-312.

Comment #1: *WAC 173-312-080 (3)- Ecology plans to implement a 10% penalty on grant recipients that don't meet Performance Expectations.*

The addition of placing performance criteria and associated 10% penalty only adds more burden to counties while allowing Ecology the ability to micro-manage local programs. Unfortunately, the process of grant oversight across the state is not consistent, there are no current performance criteria guidelines to review, and there is no appeal process in place. We recommend that the performance penalty be delayed until there is a consensus on applied criteria.

Comment #2: *WAC 173-312-080- It is proposed to revise the eighty/twenty percent allocation of funds between planning/implementation funding (Solid Waste) and enforcement funding (Health Jurisdictions).*

This revision creates even greater reduction for the planning/implementation portion from the current funding level, with no reduction for the enforcement side. The implementation/planning sectors in many of the counties are already burdened with a share of enforcement costs. We recommend that the eighty/twenty percent allocation

remain with the option given to each respective County to decide a different local allocation.

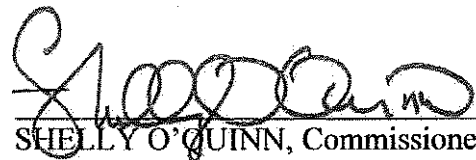
Comment #3: It is our understanding that until the current proposed rulemaking for WAC 173-312 has been finalized and adopted, distribution for the upcoming July 2017 grant cycle will be delayed. We recommend that the CPG funding continue "as is" for the upcoming 2017-2019 biennium with the idea that the proposed rule changes will take effect during the next biennium starting in 2019. This will avoid any delay in funding to solid and hazardous waste programs throughout the state as Ecology considers incoming comments and implements any changes in response to those comments.

Thank you very much for consideration of the above comments/recommendations. Please feel free to contact the Board or Debra Geiger, Spokane County Solid Waste Manger at (509) 477-7281 if you have any questions.

Sincerely,


AL FRENCH, Chair


JOSH KERNS, Vice Chair


SHELLY O'QUINN, Commissioner