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July 5, 2017

RECEIVED

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Ecology W2R

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

Re: Public Comments on Chapter 173-312 WAC Coordinated Prevention Grants and
Chapter 173-313 WAC Local Solid Waste Enforcement Grant Regulation

Dear Ms. Ramsey:

Thank you for the opportunity to be involved with the rule change and an opportunity to submit comments. I appreciate your hard work in streamlining the rules, and hope we can have a consensus on rules that work for both the regulators and the implementers. Because without both of our roles funded, to reduce waste and capture hazardous waste, will be fruitless. In consideration of the challenging budget passed from the legislatures, we should partner to provide the general public an option to recycle and capture hazardous waste. Rural areas have more challenges than the urban areas to address these programs, and therefore are in more need of financial support. Please consider the following suggestions:

1. Changing the name of Coordinated Prevention Grants is a helpful step however the proposed name is too long. We would prefer Local Solid Waste Funding, not Local Solid Waste Financial Assistance.
2. Chapter 173-312 -050 Project and Cost Eligibility
4 (h) Natural disasters where there is no hazardous substance contamination. *We prefer that recycling be allowed as an eligible expense in a natural disaster. The states air quality program has aided with locals to be prepared with organic handling methods. These materials may be processed better to follow the state goals, if finances afforded.*
3. 173-312-060 Application process
(2) Initial application period should include the time frame of availability such as 2 weeks within approval of legislatures budget. The Department of Ecology should provide timely grant applications as well as agreements. Delays in applications and agreements are often 4 - 6 months after the legislation passes the budget. Receiving funds late affects the ability to conduct the work. The following comment addresses the Performance Evaluation, of which penalties or reducing future grants is tied to work performance. Delays in the award should be included and reflected in the proposed performance evaluation.
4. Chapter 173-312-070 Application evaluation

(2)(c) Applicants past performance may be subjective to inconsistency in the department and allow too much discretion in making a determining of eliminating a grant recipients future funding. Criteria are already outlined and required for applicants. By allowing the department to broadly determine the past performance in "guidelines" does not allow for partners review. As previously stated, late grant agreements cause delayed project performance.

5. Chapter 173-312 050 (2) (a) The amount set aside for solid waste enforcement will not be less than twenty percent of the total allocation available each biennium for local solid waste financial assistance or an amount equal to the total sum of seventy-five thousand dollars per jurisdictional health department, whichever is greater. *We are not in favor of the new language and in favor of keeping the language as is due to program cuts.*

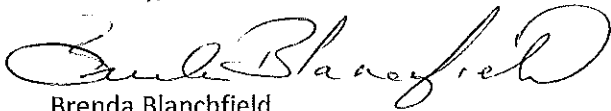
6. Preliminary Regulatory Analysis for the rule change of Chapter 173-312 and Chapter 173-313 WAC, May 2017 per Department of Ecology brings the determination to understand it isn't any cost, but it is a lowering of funds for solid waste implementation beyond the legislatures budget . Chapter 3.2 the Cost Analysis states that "While the proposed rule potentially reallocates grant funds across local jurisdictions, it does not change the total amount of funding available. Therefore, while potential funding for individual grant recipients may increase or decrease as a result of the proposed rule amendments, there is no resulting net cost.

This proposal does indeed specify that the local solid waste implementation funding will decrease within this budget cycle. It fairly unclear with this language the affects on solid waste implementation because it is a biased analysis reviewing primarily the enforcement funding.

7. The 2017 allocations will be held hostage until this ruling is adopted. *This is an in appropriate method to pass the changes to the rule. The grants should be distributed upon legislatures passing the budget.*

I hope you find these helpful comments. I understand that we are all trying to conduct the same end result, to improve our environment.

Sincerely,



Brenda Blanchfield
Solid Waste Coordinator