

Lincoln County Health Department

I would like to provide comment on the proposed CPG rule, WAC 173-312. As a local health jurisdiction, it is important to maintain the ability to meet our obligations as defined under RCW's and WAC's for solid waste enforcement. This not only includes permitting solid waste facilities, but it also includes complaint response and illegal dumping investigations. Although support for our solid waste program can be somewhat supported through fees, many of our activities such as complaint response and illegal dumping investigations do not provide a fee revenue source and can be complex and expensive. The redesign of the funding structure in WAC 173-312 truly helps in supporting our ability to meet the mandates required for solid waste enforcement as well as assures more consistent solid waste enforcement capabilities state wide.

Furthermore, establishing a minimum funding allocation to support solid waste enforcement also assures state wide solid waste enforcement capability to protect public health and the environment during low budget years.

These funding assurances for solid waste enforcement are critical to assure local health jurisdictions can maintain the capacity to conduct the mandated responsibilities of solid waste enforcement. This assurance is critical given our role is not only oversight of permitted solid waste facilities, but also over other solid waste activities such as complaint investigations and illegal dumping response.

Furthermore, with proposed changes in the Washington Administrative Code, many currently exempt solid waste facilities will lose their exempt status and require permits placing an added burden on local health jurisdiction to issue permits and oversee their operation.

The proposed redesign of the funding allocation structure in the rule will support and assure local health jurisdiction maintain the capacity to conduct solid waste enforcement consistently across Washington state for the protection of public health and the environment.