

## Benton-Franklin Health District

Thank you for the opportunity to comment on the proposed changes to WAC 173-312 and the repeal of WAC 173-313, as a member of the committee that provided input to this proposal I appreciate the level of effort and consideration put into this project by Ecology staff. Overall the proposal is sound and we at BFHD support it fully, that being said we do have some comments regarding the rule.

Section 080 Setting a minimum level of funding for solid waste enforcement activities will allow many local health departments to continue at least minimally effective program and response to complaints, illegal dumping and facility monitoring/permitting. It should be noted that this will be at the minimum funding level proposed minimal. Population increase has driven an increase in complaints, permitted facilities and public inquiries that continue to tax our existing programs at the current staffing levels. The expected, even with the suspension of the 80/20 split will result in an additional 10 percent reduction in funding thus resulting in fewer staff available to respond or additional funding from local sources in an increasingly difficult time.

The funding provided through this program allows BFHD to respond to citizen complaints and inquiries quickly and efficiently. Our complaint response can usually be measured in days with our current staffing level with the ability to continue working on an issue until resolution is obtained. Our success rate is approximately 90% with a 12 month period. We also use these funds to monitor, permit and inspect 20 facilities completing on average over 190 inspections per year. Proposed changes to WAC 173-350 will increase the number of regulated facilities expanding the needs and demands further.

While it would be nice to find a way to fund programs both implementation and enforcement at a level to achieve the goals found in the "Beyond Waste Plan" this proposal at least allows some certainty in operating required enforcement activities state wide.