

Hi, yes. Natalie Seitz, Snohomish County. I'd like to thank Ecology for the opportunity to comment both today, but also for the initial and the preliminary draft of this rule. Essentially, I would ask for two things. One that the Department of Ecology provides clarity for the proposed rule and recirculate it for another round of comments, prior to adoption. The second thing I would ask is that Ecology include impacts to local governments and business in its cost-benefit analysis. Right now I think that it's very limited in its consideration of those impacts. In fact it says that there are no impacts related to the changes in definitions. And it's clear that the contaminated soils definition is a change. I will point out that the Department of Ecology's current guidance in the stormwater manual, Appendix IV-G Recommendation for Management of Street Wastes does say there are no specific references for reuse and disposal options of street wastes in the Solid Waste Handling Standards \*[but] because they do not apply to clean soils.

I think that the response to comments today clearly demonstrates that there is a change in the way that these materials will be regulated, and not just street waste, any materials that would be subject to routine vehicle operations if that is the bar by which a release is going to be [unintelligible]. So there will be significant costs associated with this proposed rule, including permits, staff time to determine what to do with these materials, structural improvements, testing, record keeping, staff and equipment to manage soils, and the cost of contaminated soils disposal, as well as considerations of what material, vendors that currently recycle materials, how they would undertake these regulations related to soils when the end site of a soil is unknown. I will say that both the definition of clean and contaminated soils is subject to a release, then there's a MTCA standard under part A of both clean and contaminated soils. So the end site does need to be known even to determine if it is a clean or contaminated soil under the proposed rule. And that's my interpretation of it. So I thank you for considering those comments. Thank you.

Thank you very much. Is there anyone else at Northwest Regional Office who wishes to provide testimony on this rule?

\*Speaker requested change to "because" from "but".