



Affiliate of The Maryland Association of Counties, Inc.

TO: Members of the Senate Education, Energy, and the Environment Committee

FROM: Maryland Conference of Local Environmental Health Directors

RE: SB964 – Dorchester County – Well and On-Site Sewage Disposal Activities- Privatization Program

The Maryland Conference of Local Environmental Health Directors (Conference) provide this letter of **Opposition** for SB964 in their capacities as the state's twenty-four Environmental Health Directors who carry out delegated authorities from both MDE and MDH. The Conference opposes the privatization of well and on-site sewage disposal activities. The concerns are as follows:

1. In the majority Local Health Departments perform all well and on-site sewage disposal activities and are performed by health department licensed environmental health specialists. Decisions are based on COMAR, historical and geological knowledge of the county, guidance and training in conjunction with the Maryland Department of the Environment (MDE) and for the basis of the protection of public health. Although many of these activities are for the possible development of land, the protection of public health is always at the forefront of decision making.
2. We didn't find a consumer protection element within this proposed legislation aimed at providing a just fee for services for all income levels and also this proposal does not provide for the continued delivery of evaluation services by the Local Health Department or the private provider for underserved areas.
3. Local Health Department Environmental Health Programs are integrated in local permitting agencies as well as planning of the Master Water and Sewer Plans with the appropriate local agencies.
4. Proposed in this legislation **9-1104.1.(C) (2) (IV)** states MDE "Conduct mandatory compliance audits on at least an annual basis." Currently MDE does not have sufficient staff to perform audits to the local health departments as well as provide the proper and timely guidance and decision making of those processes and permits that are required to be reviewed by MDE. Regional support to local health departments is not at a sufficient level due to inadequate staffing. This requirement would be an additional burden to an already impacted program.
5. There has been an insufficient number of licensed environmental health specialists to have sufficient staffing for all 24 counties. In the last several years there have been improvements being made to increase staffing as well as longevity in the licensed environmental health specialist workforce that includes:
 - An Annual Salary Review increasing the salaries of all state employed environmental health specialists
 - The Maryland Department of Health in conjunction with Morgan State University has developed an apprenticeship program specifically creating an environmental health specialist curriculum and a career path in the environmental health field that will increase employees at local health departments.

Therefore, the Conference provide a **letter of OPPOSITION** for SB964.

For more information:

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