

Chapter 246-366A WAC Summary of Formal Comments

General Comments	Staff Recommendations
<p>This seems like a good idea to avoid confusion or wasted effort on outdated rules, so that hopefully 246-370 WAC can be adopted quickly.</p>	<p>No proposed changes. Commenter shows support for this action.</p>
<p>A lot of light has been shed on indoor air quality over the last few years, and I feel that it's really important to monitor and improve the quality of indoor air *especially* in schools. It would be nice to see the "written indoor air quality plan" from 246-370-080 include some sort of CO2 monitoring as it seems to be a decent proxy for measuring air circulation as well as being its own detriment to learning/focus at higher levels.</p>	<p>No proposed changes. This comment is out of scope for this rule hearing but will be considered when rule making continues for chapter 246-370 WAC.</p>
WAC 246-366A-020	Staff Recommendations
<p>It's perplexing that air quality is not included in the table of contents for the full language of WAC 246-366A because of the challenges we have experienced individually and collectively since the start of the 2020 COVID pandemic and the abundance of evidence* of the inextricable link between effective air quality infrastructure in public indoor spaces and health (of young people in particular).</p> <p>My son -- who attends Geneva Elementary School -- has missed 30+ days of school in each of his first three years of attendance due to respiratory illness. Without irony, I write this comment on Monday morning as he sits next to me because he, once again, has a nasty cough that made it very difficult for him to breath overnight. When this happens once or twice, it is very scary; when it happens a number of times that can no longer be counted, it becomes a pattern that emerges from egregious negligence on behalf of the adults who are legally obligated to ensure a safe learning space, and I find that offensive. It doesn't matter if the district is in a period of contraction: if you are enabling your students getting increasingly sick because you're not investing in the right infrastructure, you are responsible for an unacceptable budget and should be held accountable.</p> <p>Why, for instance, does the start of the General Responsibilities in WAC 246-366A-020 articulate:</p>	<p>No proposed changes. Staff consider that this comment shows support to repeal chapter 246-366A WAC and to continue to address air quality when rule making continues for chapter 246-370 WAC.</p>

<p>"(1) Responsibilities of school officials. School officials shall:</p> <p>(a) Maintain conditions within the school environment that will not endanger health and safety.</p> <p>(b) Identify, assess, and mitigate or correct environmental health and safety hazards in their school facilities, establish necessary protective procedures, use appropriate controls, and take action to protect or separate those at risk from identified hazards, consistent with the level of risk presented by the specific hazard, until mitigation or correction is complete.</p> <p>(c) When conditions are identified that pose an imminent health hazard:</p> <p>(i) Take immediate action to mitigate hazards and prevent exposure;"</p> <p>and yet no action has been taken to write intentional language in the administrative code that addresses air quality specifically? Is it because you are unable to take "immediate action to mitigate hazards and prevent exposure"? Do you not want your students to be healthy and avoid all respiratory illnesses as much as possible? Do you not need your students in seats to help improve the budget in the future?</p> <p>I ask these questions in good faith. We are all exhausted by these conditions and need improvements immediately.</p> <p>* https://www.reuters.com/world/europe/italian-study-shows-ventilation-can-cut-school-covid-cases-by-82-2022-03-22/</p>	
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