

**Report On Labor Camp Sanitation Program
In Washington**

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IN WASHINGTON

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REPORT OF THE WASHINGTON STATE DEPARTMENT OF HEALTH ON THE
LABOR CAMP SANITATION PROGRAM IN 1961

HISTORY

Since 1925 there have been in existence in this state Board of Health regulations governing sanitation of labor camps. Prior to the initiation of the present state wide labor camp program, the rules in effect were those promulgated in 1947.

As with other public health legislation, Board of Health sanitation regulations are written in response to a need for controlling some aspect of the environment for the protection of the health of the community. In the present case, insanitary conditions in labor camps endangering the health of occupants and indirectly the health of the community, have become increasingly evident.

Implementation of public health legislation is dependent upon a number of essential factors. Foremost among these are 1) a practical, enforceable, regulatory instrument and 2) public interest and support for the program. Prior to the last few years, sporadic and generally unsuccessful attempts have been made to implement regulations calling for the improvement of environmental sanitation conditions in labor camps, largely because of the lack of one or both of these two essential factors. Before the enactment of the present State Board of Health rules, previous ones, while having comparable standards, were ambiguous, not specific where needed, and made no provision for time for labor camp operators to comply with the regulations. Past regulations called for permits which could only be issued for camps that complied with the regulations in all respects. A vigorous program of enforcement with such regulations could have only resulted in the elimination of much of the housing that did exist for migratory farm workers. Also, in spite of conditions, widespread public interest and support for the labor camp program had never been secured. As a result little was done in the way of a concerted effort by health departments or labor camp operators to ameliorate the situation.

DEVELOPMENT

By contrast, at the present time, the 1961 rules are an effective enforceable set of regulations and there is widespread public interest in the problem of migrant labor and support for the labor camp program. These essential ingredients--enforceable rules and public support--have been brought into being through a number of national and local developments which were used as a base and built upon by state and local officials with the assistance of private groups.

In 1954 President Eisenhower formed the President's Committee on Migratory Labor. A cabinet level committee chaired by the Secretary

of Labor; this body has wielded a tremendous influence in the stimulation of interest in programs for the benefit of migratory farm workers. One of its significant achievements was the development of the "President's Committee on Migratory Labor Suggested Language for Regulations of Agricultural Labor Camps." Implementing these standards was a Federal Department of Labor ruling effective December 20, 1960. This order required that all workers recruited interstate, under the auspices of the Federal Department of Labor, be housed in camps complying either with the President's Committee recommendations or with comparable state regulations.

Paralleling national developments, the Washington State Health Department began in 1957 to explore means of revising the Board of Health regulations and stimulating a state wide campaign to correct conditions in labor camps.

In October 1957 representatives of this department met with the Farm Labor Advisory Council of the Department of Employment Security to discuss means of approaching the problem. At this time close consultation on the program was begun with the U. S. Public Health Service, the Federal Department of Labor, the State Department of Employment Security, and local health departments throughout the State of Washington. The decision was reached early in the program to develop a comprehensive revision to the rules and regulations then in existence, utilizing the developmental process to stimulate interest and gain support for the program.

Beginning with a draft of regulations similar to the President's Committee standards, the department began a long process of revision, consultation, and revision. All interested groups and parties were consulted. Public meetings were held to discuss the proposed standards. Conferences with local, state, and national agencies were continued. Suggestions were solicited from farmers, processors, church groups, and individuals. Changes in form and content were made where indicated and in all, 11 separate drafts were written prior to the adoption of the present standards by the Board of Health. In March 1960 the final draft of the present regulations was adopted. In October 1960 the effective date was set as March 1961 to permit health departments time to mobilize resources, survey camps, disseminate necessary information, and otherwise prepare for effective enforcement programs.

PRESENT PROGRAM

In January 1961 at the request of the Board of Health, this department made a survey of the state wide labor camp program and submitted the attached "Report to the Washington State Board of Health on the Status of the Labor Camp Program." This report was submitted on February 17, 1961, the month before the new rules and regulations became effective.

Although few of the then estimated 700 labor camps throughout the state are occupied as early as March, 38 percent of the total number of camps were reported to have already been inspected. Over 18 percent were already under permit.

In August 1961 a new survey was made. At this time, of the total number of 499 camps reported to exist and come within the purview of the regulations in the State of Washington, 386 camps or 79 percent had been issued either full or provisional permits. The remaining camps had either been denied permits, had decided not to operate in 1961, or had yet to be approved for operation in the fall harvest.

To understand the investment of staff time represented by the above results and the significance of provisional permits as opposed to full permits, it is necessary to review the procedure utilized to bring a labor camp into conformance with the regulations. The administrative devices consist of an Application for Permit, an Inspection Report, A Plan for Compliance, and a Permit. (Copies of these forms are attached to this report.)

The procedure for utilizing these forms involves 1) Survey of the labor camp and completion of an application for a permit, including a plot plan of the camp; 2) Completion of an inspection report with notations of all sanitary defects and violations observed; 3) In the case of camps which cannot provide all facilities and make all corrections immediately, development of a plan for compliance with the rules and arriving at a time schedule that meets with the approval of the health officer; and 4) the issuance of a full or provisional permit.

On the Plan for Compliance, items having the most immediate effect on health are scheduled to be corrected first. Those of secondary importance are scheduled for later dates. A provisional permit is issued when an acceptable agreement has been reached by the health officer and the camp operator as to a time schedule for conformance with the rules. Only in those cases where all work can be accomplished at once is a full permit issued. In all cases where any work remains to be performed prior to the use of the labor camp, reinspections are made to assure fulfillment of the agreement.

PROGRAMMING CONSIDERATIONS

All of the above functions necessary to the application of labor camp sanitation regulations to each individual camp devolve upon the sanitarians employed in local health departments. These sanitarians--public health specialists in environmental hygiene--under the direction of local health officers also carry on nearly two dozen other public health programs. The sanitation of schools, restaurants, markets, camps, parks, water supplies and sewage disposal systems, and many other facilities are supervised. With these and other programs requiring attention, a process of selection must come into play for the determination of those areas which

are to receive most emphasis in the environmental sanitation program of any department. This process of selection is largely based upon the health needs of the individual community and upon public interest, support and demand for programs. Unless available funds are increased with added programs, old activities must of necessity give way to new or new programs cannot be implemented.

PROGRAM QUESTIONNAIRE

The attached survey sheet entitled "Tabulation of Responses to Labor Camp Program Questionnaire, August 20, 1961," shows that while varying widely with the jurisdiction, local health departments have devoted an average of 4.75 hours to each labor camp this year. This is generally in excess of the time devoted to supervision of many other establishments, such as restaurants, schools, markets, mobile home parks, etc. These figures of average man hours per camp reflect the priorities allotted to the program when needs are balanced against those of other programs, but they also are affected by other factors. Past work in surveying labor camps eliminates time needed for location and tabulation. Geographical factors come into play since many camps are spread over large areas with access only by rudimentary roads. The interest and cooperation of the farming community in each county exerts an effect, in that those who come forward to apply for permits need not be searched out by sanitarians in the field.

An example of the effect of past work on the program can be found in the county of Skagit where the program was begun early, assigned a high priority, and was carried out in an effective manner. Here, although the preliminary survey of all camps, which had been accomplished in previous years, reduced the time necessary to bring each camp into compliance with the regulations, a minimum of six hours per camp was still invested. Again, in the counties of Chelan and Douglas where the location of camps was not known, an intensive public relations program and excellent cooperation on the part of the fruit growing industry made possible an effective program with the investment of the extremely low average of two hours per labor camp. On the other hand, in areas where the total problem was small in comparison to available staff and where high priority was placed upon the program, the average hours devoted to each camp inspected runs from 20, as in Walla, and 26.1, as in Seattle-King County, to as high as 40 in the case of Klickitat County where only two labor camps are reported.

It may be noted in the row entitled Percent of Total Camps Issued Permits that with the exception of Pierce County, all counties having appreciable numbers of camps had issued permits to in excess of 80 percent of the total camps reported to exist within the jurisdiction. In the case of counties with smaller numbers of camps, of course, the percentages are less meaningful, since if 2 or 3 camps out of 7 or 8 (as in the case of Grant County) decide not to operate, it brings the percentage down to 75 percent.

In Pierce County the figures require some clarification. Of a total of 136 reported, only 11 camps were issued permits of any kind. There was devotion of 1.2 man hours to each of the 136 camps inspected however. The reason for this small number of labor camps issued permits, in spite of a substantial investment of total time, is reported to be due to the fact that many growers in this particular area have decided to use "day haul labor," that is labor which resides in nearby population centers and is transported to and from the fields each day. Many of the growers in this county have also reportedly converted some of their labor housing to other purposes, thereby reducing their facilities below the minimum numbers dealt with by the present regulations. It is believed that the use of day haul labor may be regarded as an interim measure in some cases and that more camps in Pierce County may therefore be brought back into use in the coming years. On the other hand this trend toward abandonment of camps in favor of the use of day haul labor may, of course, continue.

On the whole, when the indefinite situation in Pierce County is discounted, the state wide picture presented is one of regulated facilities. It is encouraging that, of the 386 labor camps brought under permit this year, not a single case has required legal action of any kind. Moreover, when the additional comments of local health departments on the program questionnaire (attached) are reviewed, it is evident that there are no serious grounds for fear for the future of this program. Seattle-King County, Tacoma-Pierce County health departments, and Bellingham-Whatcom Health District do, however, make pointed reference to the need for additional funds or staff time to adequately cope with the new action program. The Bremerton-Kitsap County Health Department and the Grant County Health Department, representing areas with 15 camps and 7 camps respectively, take issue with the stringency of the requirements, relating them to the short period of time that the camp facilities in those areas are used. No other comments have been received which would in any way reflect a lack of optimism with respect to the program in the coming years.

COMMUNITY ACTIVITIES

Since, as pointed out above, this program requires sustained public support and since the labor camp sanitation program is only one part of an over-all problem, involving the standard of living of people, effort has been made to capitalize upon continued public interest and encourage the provision of other health services to labor camp occupants.

A multi-disciplinary migrant labor committee has been formed in the State Department of Health. The committee is composed of representatives of nursing, health education, training, epidemiology, engineering and sanitation, child health services as well as the Office of the Director.

This committee has met periodically to plan means of coping with the health problems of migrant labor. Under its auspices, representatives of the department have met with community groups in various parts of the state, assisting them in their activities as they relate to organization for the provision of health services. The committee also provides technical guidance in health matters and liaison where experience in health programs of one community may benefit others planning for the expansion and extension of local health services for migrants.

RELATED PROBLEM AREAS

The general reason for the labor camp sanitation program, as indicated in the introductory statement of the regulations, is "The improvement of the level of health and sanitation in labor camps." The specific purpose, however, is the control of disease in the occupants of labor camps. This is pointed out in the attached discussion of the Board of Health regulations entitled "Sanitation Aspects of Labor Camps." All provisions are oriented toward the accomplishment of this goal. If analysis of present or future trends or consideration of related problems not met by the present regulations should indicate the need for an expanded program, appropriate recommendations will be made to the Board of Health. Two such areas receiving present attention are the need for improved field sanitation and a possible trend toward using day haul labor instead of labor camps with increasing use of substandard housing in urban areas.

The matter of field sanitation, i.e., the provision of sanitary facilities in the fields where the crops are cultivated and harvested, while closely related to camp sanitation, is a separate problem. Since this problem has not been studied in this state, its scope is unknown. While the principles of the risks involved are understood by public health officials, neither the extent of the hazards to the workers or to the consumers of the crops is fully known. Neither is it known what investment of staff time would be required to study the problem or to initiate and carry out a program.

With regard to the second problem, that of the possible trend toward relocation of laborers from abandoned regulated camps to unregulated housing in urban areas, experience in the coming years should provide useful information. If, as in Pierce County, labor camps continue to be reported abandoned in favor of the use of day haul labor, the adequacy of other housing will be evaluated and appropriate recommendations made to legislative bodies.

CONCLUSIONS AND RECOMMENDATIONS

While the labor camp program is not new in terms of legislation, the present state wide program based on current regulations is less than one year old. Studies in January and August of this

year have indicated the devotion of substantial amounts of staff time to this program, vis-a-vis other competing sanitation programs. Since the only two major related problems that have been identified, i.e., field sanitation and the trend toward relocation of migrants from labor camps to other housing situations, need further study, no change in program scope is as yet recommended. As most labor camps have been inspected and subsequently issued permits, it must be assumed that the regulations are not unreasonably stringent. The fact that some camps have discontinued operations altogether rather than comply with the rules would seem to offer substantiation of the conviction of this department and other agencies that the regulations are capable of effecting meaningful improvement in the labor camp environment.

In the light of these considerations, it is recommended that no changes be made in legislation affecting these camps until more experience with the present program has been gained.

WSDH:ES

12/18/61:200

JANUARY, 1961
REPORT TO THE WASHINGTON STATE BOARD OF HEALTH
ON THE STATUS OF THE LABOR CAMP PROGRAM

Pursuant to the December 9, 1960 directive of the State Board of Health to the State Health Department, requesting a report on the current status of the labor camp program, the following is respectfully submitted:

This report embraces a brief account of the principal activities of this department in connection with the labor camp program and an evaluation of the progress attained and the problems encountered in the preliminary implementation of the State Board of Health Rules and Regulations governing Sanitation in Labor Camps, by local health departments, since their adoption by the State Board of Health on March 11.

STATE DEPARTMENT OF HEALTH ACTIVITIES

The principal activities of this department have been directed toward program promotion, coordination, and administrative assistance.

To promote local health department implementation of the State Board of Health Rules and Regulations governing Sanitation in Labor Camps, all local health departments reporting substantial numbers of labor camps within their jurisdictions have been visited by State Health Department consultant sanitarians. Meetings have been promoted with local health departments and groups of camp operators. Considerable publicity has been obtained through newspaper and radio, the extension service news media, and various growers association news bulletins. Also presentations have been made to growers association groups, explaining the background, development and objectives of the labor camp program.

Efforts to insure coordination of the various local health department programs have been made through liaison, policy making and the encouragement of uniform interpretation and application of the rules. Coordination between local health departments and local branches of the Employment Security Department has been obtained by the accomplishment of a written policy statement and working agreement between the State Director of Health and the Commissioner of the Department of Employment Security, with the approval of the Federal Department of Labor. Also, the Washington State University Extension Service has been kept apprised of the labor camp program and encouraged to assist camp operators in complying with the rules.

To provide administrative assistance, the appropriate administrative devices were drawn up by this department for the implementation of the rules and regulations and their use explained and encouraged. Also, local health departments were assisted in the evaluation of the extent and nature of the labor camp problem in their areas where necessary. Uniform policy statements in the interpretation of the rules and clarification of their intent and application have been made when necessary.

In addition to program promotion, coordination and administrative assistance in the labor camp program, the department has begun plans to encourage the extension of other health programs and services to the migrant laborers occupying camps in this state where they are lacking and to promote community activities to cope with the need for education of the camp occupants. Toward this end the State Health Department Migratory Labor Committee has been formed and regional conferences planned. The first of these is planned to be environmental sanitation workshops for migrant missionaries and teachers. The first such workshop is expected to materialize within the next few months prior to the peak of the migratory labor season.

IMPLEMENTATION OF THE STATE BOARD OF HEALTH RULES AND REGULATIONS BY LOCAL HEALTH DEPARTMENTS

To obtain up-to-date information on the present status of local health department labor camp programs, a questionnaire was sent to all local health departments in the state and the responses tabulated.

Progress in Implementation

In addition to the number of labor camps reported, there are in existence approximately 150 in Okanogan County, and an estimated 15 or 20 in other counties not reporting early enough to be included in this tabulation. The percentage of camps located and inspected in counties throughout the state varies considerably, ranging from as low as 13% to 100%. The principal reason for this wide variance lies in the lack of correlation between available staff and the extent of the labor camp problem. Where a large number of camps exist within a jurisdiction with a small staff of sanitarians, the progress has been slow. Where the number of local health department sanitarians is more nearly adequate to cope with the inspection of labor camps within their jurisdiction and where work was begun early in the program, as in the case of Skagit and Whatcom Counties, the progress has been excellent. The over-all number of camps coming within the purview of the regulations throughout the state is estimated at about 700 and the percent inspected to the date of this report is 38%. While this percentage may appear to be low, it should be viewed in the light of two factors. The first is the exceedingly large number of camps in the understaffed areas of Chelan-Douglas and Okanogan Counties, departments with two and one sanitarian respectively. The second relates to the season when the camps will be in operation. While March 1 is the effective date of the regulations, many of the camps, particularly in the Chelan-Douglas and Okanogan areas, will not be in operation until late summer or early fall and therefore the interest of those camp operators in the regulations cannot be anticipated this early in the year, in spite of concentrated public relations and publicity in that area.

In an effort to offset the acute problem posed by the labor camp program in these understaffed areas, a temporary sanitarian has been employed by this department and loaned for use in that area for approximately two months. It is anticipated that these counties will be able to provide sufficient staff to carry on the program in the future.

Evaluation of Rules and Regulations

Relative to the number of permits issued to date, it is noteworthy that 79 have been issued provisional permits, while only 21 have been granted full permits outright. This would seem to indicate that most camps will have to undergo substantial improvement before complying with the rules. It may be concluded therefore that while the present rules are a compromise with ideal standards and considerably less exacting and comprehensive than the President's committee recommendations for migrant housing that they are sufficiently stringent to effect a marked improvement in the environmental sanitation of this segment of the population.

In this connection, it is encouraging to note that with the exception of one request for more specific standards on water supplies, the only comment on weaknesses of the rules and regulations pertained to space requirements. One comment relative to space, specifically, that over-all square footage of living quarters is not a fair basis for estimating capacity, included the observation that actual occupancy in that area was invariably less than that allowed by the square footage. That this situation does not prevail in many areas has been shown by experience elsewhere. Therefore, while space requirements, an object of much previous controversy, are as recognized minimal, they are also realistic. The other comment on space requirements was the inconsistency of .60.090 (1) (d) with .60.090 (2) (c), discussed under Summary and Recommendations of this report.

Defects in Environmental Sanitation

The responses to the inquiry relative to the principal defects noted in the environmental sanitation of labor camps also bears out the appropriateness of the present rules and regulations. While the required numbers of central facilities--bathing, handwashing, laundry and toilet facilities--are regarded as extreme minimums, these are still the most commonly noted defects in existing camps. Also inadequacies in water supply, sewage disposal, space requirements, garbage cans, sanitation of mattresses, and dwelling units, as well as ventilation and lighting, were mentioned indicating the need for these requirements.

Problems in Implementation

The problems reported in the implementation of the labor camp rules were numerous and important; however, none seemed to be insurmountable obstacles to the carrying out of effective programs. While the adverse publicity engendered in the development of the regulations has been reported to be having a deleterious influence on the program, the condition and consequent needs for improvement of the camps made such publicity inevitable. Also, such publicity was doubtless instrumental if not vital in pointing up the need for an action program. Another problem cited in the program, that of the need for substantial capital investments for camps that are used a short period of time or for camps that are maintained on leased lands, is also an intrinsic part of the problem which caused the camps to be maintained in such conditions that an all out program became necessary. Doubtless the resolution of the economic problems involved will be expedited as the need for improving the housing is confronted by camp operators, under pressure of health department action in this field. The remaining problems in implementing the labor camp program that were cited--the difficulty in locating camps, the lack of response to requests for applications for permits for farmers, and the lack of sufficient manpower to carry out this program--are also related to the lack of activity in the program in the past. The solution to these problems quite evidently lies in the expenditure of additional funds.

The final problem cited in the responses to the questionnaire is the mistreatment of the facilities by the occupants of the labor camps. This is related to attitudes, as well as educational achievement of the camp occupants and it may be hoped that the improvement of the facilities provided in labor camps may itself bring about some beneficial change in this respect. However, as pointed out above, it is recognized that some educational activities are needed to cope with this problem. In addition to the involvement of community groups in the education of the migrants, the provision of appropriate educational material, e.g., placards, posters, comic strip type instruction materials, is planned to either be obtained from the Public Health Service or provided by this department. It is hoped that this material can be produced by the Federal government and distributed nationally so that maximum exposure of the migrant to this educational material can be achieved.

Relationship with the Department of Employment Security

With respect to the inquiry relative to the development of an effective working relationship between the health departments and the local branches of the Department of Employment Security, the responses indicate that an effective and mutually beneficial relationship has been achieved as planned.

Further Action Needed

Consideration of the matter of what further assistance should be provided for local health departments by this department or other state, Federal, or local agencies has been left until last because suggestions received should provide a set of guidelines for future action by this department in the labor camp program.

The most commonly mentioned area of the labor camp program, in which assistance is needed by local health departments, is the need, mentioned above, for some means of changing the attitudes and behavior of the occupants of labor camps so that the initial gains in the improvement of facilities will not be lost through careless destruction or ignorant misuse of improved facilities. Therefore, health education for the migrants and the stimulation of community interest in the welfare of this group will form an important part of the labor camp program at the state level in the future. Also, to counteract the adverse publicity for the farmer and for enforcement agencies, the public relations aspect of the program will be oriented toward favorable publicity to the agricultural community, local health departments, the migrant missionary groups, and the migrants themselves in an effort to reconcile the differences among these groups and to foster a healthy attitude of mutual cooperation.

In order to answer the need for insuring uniformity of application and enforcement of the labor camp rules and regulations, and maintaining liaison among local departments, close contact will be maintained by this department with all local health department programs through visits by the staff and periodic reporting.

Relative to the frequently expressed concern of local departments over the need for additional funds and manpower for this program, it is a matter of major concern that resources are inadequate to take on this additional activity.

Another often mentioned need for assistance by local health departments in the labor camp program is the provision of detailed plans and recommendations for labor camps, including plans for model dwelling units and sanitary facilities. During the development of the rules and regulations the Farm Advisory Committee to the Department of Employment Security requested that when the rules and regulations were adopted by the State Board of Health that such plans be provided by this department to assist farmers in complying with the regulations in new construction. It was originally contemplated that the provision of such information would be a joint effort between the Washington State University Extension Service and the State Health Department. As the project has been considered in detail by these two agencies, it has become apparent that this endeavor will entail considerably more time and expense than originally estimated.

For this reason, the Extension Service architect's office has indicated that they are not sufficiently staffed to proceed with this project. It is likely, therefore, that other means will have to be found to fill this need. The Public Health Service has been contacted relative to this problem and may be able to provide some assistance.

Summary and Recommendations

The over-all state wide labor camp program is proceeding along lines as expected. Progress has been satisfactory in the issuance of permits to labor camps when the peak seasons of camp operations are taken into account. Special needs for education of migrants and public relations efforts have been recognized and preliminary steps have been taken to satisfy these needs. Various means are being explored to provide educational material for the migrant workers and plans and recommendations to assist camp operators in complying with the rules and regulations governing sanitation in labor camps.

One inconsistency in the rules and regulations has been discovered and the appropriate change is requested as follows:

Whereas Section .60.090 (1) (d) (for existing construction) reads "Each dwelling unit shall contain 70 square feet of floor space for the first occupant" and

Whereas Section .60.090 (2) (c) (for new construction) reads "Each room designed or used for sleeping purposes shall contain 70 square feet of floor space for the first occupant" and

Whereas no difference in this portion of the wording was intended and the difference in wording of the two subsections causes confusion and interferes with the uniform interpretation of the rules

It is hereby respectfully requested that the board change Section .60.090 (2) (c) to read as follows:

"Each dwelling unit shall contain at least 50 square feet of floor space for the first occupant and at least 50 square feet of floor space for each additional occupant. At least $\frac{1}{2}$ of the floor area of each habitable room shall have a minimum ceiling height of 7 feet and no floor space with a ceiling height less than 5 feet shall be counted."

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12/18/61:200

SANITATION ASPECTS OF MIGRANT LABOR CAMPS

Background

The public health program governing sanitation of housing is aimed specifically at the prevention of disease. Those situations, with inherent factors operating to pose special hazards to the health of the occupants and indirectly through them to the remainder of the community, receive special attention from health agencies. Labor camps housing migratory agricultural workers frequently constitute such a situation.¹

Unlike much housing in the United States, labor camps are frequently constructed in rural areas remote from the inspection and supervision of regulatory agencies. As they are frequently constructed for use during only short periods of the year and represent a capital investment in what is often a marginal industry with unpredictable economic stability, they are frequently built at as low a cost as is possible. The consequent adverse effect of inferior materials and poor design is often compounded by the poor workmanship of unskilled farm hands utilized as amateur craftsmen during periods of slow farm activity. Since migratory laborers occupying labor camps are only present for short periods and therefore may not regard the dwellings as they would long term domiciles, mistreatment of the dwelling units and sanitary facilities is frequently reported. As both men and women often work in the fields, unattended children are reported responsible for abuse, as well, and dwelling units, sanitary facilities and general maintenance of the camp-grounds suffer accordingly.

Rules and Regulations

The hazards to health frequently existing in this environment are reflected in the provisions of the Washington State Board of Health Rules and Regulations Governing Sanitation in Labor Camps. These regulations, as revised in March 1961, are minimal standards less strict than the President's Committee on Migratory Labor recommendations which are viewed by many health workers as a national guide for minimum standards for migrant labor housing.

Like other public health regulations which govern the domestic environment, these deal with: the provision of pure water; the safe disposal of human and domestic waste; the prevention and control of vectors of disease; the provision of dwelling units which are lighted, ventilated, and adequate in space to prevent overcrowding and permit hygienic housekeeping; maintenance to provide clean surroundings and protect occupants against inclement weather; and sanitary facilities to permit minimum standards of personal hygiene.

1. Malcolm H. Merrill, M.D., M.P.H., "Community Health Services in Rural Areas," The Sanitarian, Vol. 18, No. 1, July-August, 1955.

In addition, where central food preparation facilities are provided, appropriate regulations are applied to minimize the transmission of food borne illness.

Water Supply

Since water related as well as water-borne diseases are especially prevalent among the lower socio-economic groups, the regulations require an adequate supply of hot water for laundering and bathing, as well as potable water for drinking.² Common drinking containers are categorically prohibited in order to prevent transmission of fomite borne infections in this manner. Interior running water is required in new dwelling units to decrease the potentiality of disease transmission involving gastro-intestinal infections.³

Sewage and Liquid Waste Disposal

Since sewage and liquid waste disposal systems constructed without the guidance of regulatory agencies frequently result in the surface emergence of wastes which potentially contain pathogenic organisms, the regulations require that an approved private sewage disposal system be provided where a public sewer is not available.

Plumbing

To prevent hazards associated with back-syphonage of contaminated liquids, cross connections are prohibited, and to assure proper operation, plumbing is required to conform to basic plumbing principles as set forth by the State Board of Health. These principles make recommendations relative to the design, construction, and maintenance of the entire plumbing system, stressing the results desired and providing for testing the work but not specifying details of how the results must be achieved. Examples of provisions are adequate volume and pressure in the water system for flushing purposes, adequate venting of the system, necessary traps and cleanouts, and maintenance of water quality which meets State Health Department bacteriological standards.

Refuse Disposal

In order to prevent insect breeding, rodent harborage, or other health hazards, the storage, collection, transportation, and disposal of refuse is regulated with respect to equipment, design, storage, location, and management of collection and disposal.

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2. Richard Smith, M.D., "The Effect of the Health of Migrants on the Health of the Community," Unpublished, Presented at "Migrant Labor - Our Community Concern," May 15, 1961.
 3. "Relationship of Environmental Factors to Enteric Disease," Public Health Monograph No. 54, U.S. Department of Health, Education, and Welfare, Public Health Service.

Rodent and Insect Control

Due to the possible diversity of rodent and insect problems, the general requirement is made that appropriate measures be taken for control to prevent vector borne disease transmission, as well as to limit infestation of biting arthropods which might cause lesions subject to secondary infections.

Location and Maintenance

Provisions are made with respect to the location and maintenance of camps for the purpose of minimizing hazards to the health of occupants. Camps must be located on well drained sites, the grounds must be maintained clean and free from refuse, and sand or dust originating in the camp must be stabilized where necessary.

Dwelling Units

The construction of the dwelling units themselves is regulated to provide for protection of the occupants against the elements. The housing must be constructed to provide for privacy, prevent rodent infestations, and must have adequate space to minimize the air-borne transmission of disease-producing organisms. Also they are required to be kept clean and in good repair at each change of occupancy. In newly constructed dwelling units, space requirements are slightly increased and provisions must be made for adequate storage facilities for the occupants' possessions. Slightly lower space requirements in existing housing are a reconciliation of the need to use existing facilities with the need to provide optimum or more desirable living space standards.

Ventilation and Heating

Some specific requirements are included with respect to the provision of adequate ventilation to aid in minimizing the transmission of respiratory infections. All dwelling units must be provided with means of cross or through ventilation to allow for an exchange of air. The windows in all dwelling units must be openable to at least 45 percent of their aggregate area. In newly constructed units, window openings to the exterior must represent an aggregate area of at least 10 percent of the floor area of the dwelling.

Heating must be provided only if housing is used during periods of cold weather. When provided, the heating facilities must be installed and vented in such a manner as to avoid a dangerous concentration of fumes or the posing of a fire hazard.

Lighting

In order to permit effective cleaning and maintenance in the interior of dwelling units, the regulations require the provision of adequate

lighting in all housing and new construction must have at least one ceiling type light fixture and one separate wall or floor type outlet, as well.

Sanitary Facilities

Minimum numbers of toilet, lavatory, bathing, and laundry facilities are provided for and are required to be separate, as necessary, for the sexes, to encourage use. If the facilities are not located in the dwelling units they must be located within reasonable distances for the same reason, and must be constructed in such a manner to facilitate cleaning. The toilets must be of approved types designed to prevent access of flies and rodents to human waste materials.

Food Handling Facilities

If food handling facilities are provided, they must conform to the Rules and Regulations of the State Board of Health governing food establishments. These are the same rules enforced in restaurants throughout the state.

Bedding

Beds or bunks must be provided. This is to discourage the primitive practice of sleeping on floors which is still reported among some ethnic groups of migrant farm laborers. It must be assumed that this practice brings the sleeper into contact with cold surfaces and increases the inhalation of dust. These conditions, which may increase the hazard of respiratory infections, are therefore discouraged.

Supervision and Responsibility

The final provisions of the Washington State Board of Health Rules and Regulations governing Sanitation in Labor Camps place the responsibility for cleanliness and repair of the camps upon the operator and require that reasonable efforts be exercised by him to remain aware of the presence of communicable disease and to report any known cases to the health officer. This placement of responsibility is felt necessary due to the transient nature of the occupancy and the socio-economic status of many occupants, which, experience has shown, necessitates the exercise of a certain degree of guidance.

This final section of the regulations places the emphasis appropriately on the over-all objective of the regulatory instrument: improved sanitation and the prevention of communicable disease.

Conclusion

Since the adoption of the present rules in the state of Washington, experience has shown that appreciable defects exist in all areas discussed.

Numerous violations have been found in the areas of water safety, safe sewage disposal, adequate living space, and sufficiency of sanitary facilities. The fact that only 36 percent of the labor camps in the state could qualify for full permits, the first year indicates the need for enforcement of these minimal standards in this special kind of housing to assist in the prevention of disease.

WSHD:ES

APPLICATION TO OPERATE A LABOR CAMP IN THE STATE OF WASHINGTON

In accordance with the Rules and Regulations of the State Board of Health, .60.010 through .60.170, it shall be unlawful for any person, firm or corporation to operate a labor camp in the State of Washington who does not possess an unrevoked permit from the Health Officer having jurisdiction. Only persons who comply with requirements of these rules and regulations shall be entitled to receive and retain such a permit.

County..... Town..... Date.....

Name and location of camp.....

..... Type (agricultural, construction, etc.).....

Owner of property..... Address.....

No. of dormitories..... No. of cabins.....

Maximum occupant capacity.....

Source of water supply.....

Method of sewage disposal.....

No. of units having running water.....

No. of outside faucets..... Maximum distance of dwelling units from faucet.....

No. of units having private toilet..... bathing..... handwashing.....

No. of units having laundry facilities.....

No. of units using central facilities.....

No. central toilet facilities: Flush toilets Male..... Urinals..... Female.....

Privies..... Male..... Urinals..... Female.....

No. central handwashing facilities: Male..... Female.....

No. and type central laundry facilities (sinks, tubs, machines).....

No. central shower facilities: Male..... Female.....

No. of covered garbage cans..... Size.....

Method of garbage disposal.....

Remarks:

A camp plan indicating the relative position of all dwelling units and sanitary facilities is requested.
(May be drawn on reverse side.)

.....
(Signature of applicant)

Camp plan submitted (date)..... Permit No..... Issued (date).....
(If provisional, so indicate)

Approved (date)..... Approved by

STATE OF WASHINGTON DEPARTMENT OF HEALTH
LABOR CAMP INSPECTION FORM

Permit No.

Name of camp Location

Owner Operator

No. of dwelling units No. of occupants

Items marked (X) are in violation of the Rules and Regulations of the State Board of Health governing Labor Camps.

.60.030 Water Supply:

Existing:

- Accessible ()
- Common cups ()
- Adequate quantity ()
- Adequate pressure ()
- Hot and cold water ()
- Within 100 feet ()

New:

- Running water in units ()

.60.040 Sewage and Liquid Waste Disposal:

- Approved disposal system ()

.60.050 Plumbing:

- Conforms plumbing principles ()
- Cross connections ()

.60.060 Refuse Disposal:

- Approved containers ()
- Adequate number ()
- 100 feet ()
- Storage devices ()
- Fly breeding ()
- Rodent harborage ()

.60.070 Rodents and Insects:

- Control measures ()

.60.080 Location and Maintenance:

- Satisfactory site ()
- Maintenance ()
- Dust control ()

.60.090 Construction and Maintenance:

Existing:

- Protection against elements ()
- Privacy ()
- Clean ()
- Good repair ()
- Tight floors ()
- Under-space clean and unskirted ()
- Adequate floor space ()
- Ceiling height ()

New:

- Rodent proof ()
- 18 inches above ground ()
- Adequate floor space ()
- Ceiling height ()
- Storage facilities ()

.60.100 Ventilation:

Existing:

- Adequate window openings (45%) ()

New:

- Window openings 10% ()
- Adequate ventilation ()

.60.110 Heating:

- Adequate ()
- Properly installed and vented ()

.60.120 Lighting:

Existing:

- Adequate ()

New:

- Ceiling light ()
- Floor or wall outlet ()

.60.130 Toilet, Handwashing, Bathing and Laundry Facilities:

- Adequate toilet facilities ()
- Adequate bathing facilities ()
- Bathing facilities separate for sexes ()
- Adequate lavatories ()
- Adequate laundry facilities ()
- Walls light colored ()
- Walls water impervious ()
- Floors water impervious ()
- Floors smooth and cleanable ()
- Floors sloped to drains ()
- Facilities well lighted ()
- Facilities well ventilated ()
- Located within 200 feet ()
- Approved privies ()
- Privies separate for sexes ()
- Privies located within 50 feet ()

.60.140 Food Handling Facilities:

- Comply with state rules ()

.60.150 Beds and Bedding:

- Beds or bunks furnished ()
- Bedding clean and sanitary ()
- Beds properly spaced ()

.60.160 Supervision and Responsibility:

- Camp well maintained ()

.60.170 Communicable Disease:

- Reported ()

.60.180 Plan and Time Schedule:

- Submitted ()
- Acceptable to health officer ()

Remarks:

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Improvements since last visit:

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Sanitarian

STATE OF WASHINGTON DEPARTMENT OF HEALTH PLAN AND TIME SCHEDULE FOR COMPLIANCE WITH THE RULES AND REGULATIONS GOVERNING LABOR CAMPS

In compliance with Section .60.080 of the State Board of Health Rules and Regulations governing Labor Camps, I the owner and/or operator of the labor camp, identified as.....

and located at.....

do hereby submit the following plan and time schedule for compliance with said rules which I will follow to the best of my ability. It is understood that issuance of a permit will be contingent upon approval by the health officer of this plan for compliance and reasonable conformance to the time schedule herein set forth.

Items Not in Compliance

Planned Dates of Compliance

[illegible]

Submitted by _____
Signed _____

Signed

Date _____

Witnessed.....

Approved by _____
(Health officer)

(Health officer)

Date _____

Date



State of Washington
DEPARTMENT OF HEALTH
Olympia

Chapter .60 of the Codified

RULES,
REGULATIONS & STANDARDS
OF THE
State Board of Health



SANITATION
LABOR CAMPS

Revised and Adopted March 11, 1960
Amended May 27, 1960

Introductory Statement

The State Board of Health recognizes the need for improving the level of health and sanitation in the labor camps of this state and is cognizant of the economic, social, and physical problems involved in the enforcement of minimum standards toward this end. The rules and regulations adopted by the State Board of Health on March 11, 1960, pertaining to labor camps are therefore to be liberally interpreted and applied toward an orderly and progressive improvement of the facilities defined:

Rules, Regulations, and Standards of the State Board of Health, Sanitation—Labor Camps.

.60.010 Definitions

(1) "Labor Camp": Shall mean buildings, structures or shelters together with the land areas pertaining thereto, housing or capable of housing 10 or more workers employed in agriculture, logging, mining, construction or like work. This shall not apply to facilities provided for railroad workers nor to those buildings, structures, and land areas defined as mobile homes, mobile home parks, tourist courts, motels, resorts, and like accommodations which are covered by other state laws or rules and regulations, nor shall it apply to year round housing provided for permanent employees on a farm. (Amended 5-27-60)

(2) "Dwelling Unit": Shall mean any facility which is used or intended to be used for living, sleeping, and/or cooking and eating.

(3) "Person": Shall mean an individual, firm, partnership, corporation, company, association or joint stock association and the legal successor thereof.

(4) "Health Officer": Shall mean the city, county, city-county or district health officer, as defined in Section 70.04.030, 70.06.020, 70.04.020, and 70.08.040 of the Revised Code of Washington or his authorized representative.

(5) "Refuse": Shall mean all putrescible and non-putrescible solid waste, including garbage, rubbish and ashes, except body waste.

(6) "New Construction": Shall pertain to any building or addition thereto constructed or remodeled after the date of adoption of these rules and regulations.

.60.020 Administration

(1) It shall be unlawful and a violation of these regulations for any person to operate a labor camp in the State of Washington, housing ten or more workers or capable of housing ten or more workers, who does not possess a valid current "permit" or "provisional permit" as issued by the health officer in the name of such person, for the specific labor camp.

(2) Every "permit" shall be valid for a period not in excess of one year and may be renewed. Issuance, retention and renewal of this "permit" shall be contingent upon compliance with these rules and regulations as determined by the health officer. Failure to comply with these requirements shall be cause for denial or revocation after due notice and opportunity for hearing.

(3) The health officer may issue, or renew, a "provisional permit" for a period not to exceed one year, when in his judgment conditions warrant such action. (Amended 5-27-60)

(4) Applications for permits, or renewals thereof, shall be on forms prepared by the health officer and shall be submitted to the health officer at least 15 days prior to the operation of the camp and shall include such information as required on the application form. (Amended 5-27-60)

(5) No major changes or alterations shall be made to any part of the camp without prior approval of the health officer. All remodeling shall comply with new construction standards and when the extent of the remodeling is greater than 50 per cent of the present replacement value of the building, the entire building shall meet the standards of new construction.

.60.030 Water Supply

(1) Existing Construction

(a) An accessible and adequate supply of potable water, at normal operating fixture pressure, during periods of maximum use, shall be provided in each labor camp.

(b) The use of common drinking cups or containers is prohibited.

(c) Hot and cold running water shall be provided for each central bathing, hand washing, and laundry facility.

(d) Potable water shall be conveniently located not more than 100 feet distant from any dwelling unit.

(2) New Construction

(a) Full compliance with .60.030 (1)—(a), (b), and (c).

(b) Running water shall be provided in each dwelling unit; except for sleeping dormitories, with adjacent central facilities, which are intended for use by a single sex.

.60.040 Sewage and Liquid Waste Disposal—Existing and New Construction—All liquid waste discharged from the camp shall be disposed of in a manner approved by the health officer. The disposal system shall be located and maintained where it will not create a hazard to the health of the camp occupants or to the owner or occupants of adjacent property. Where a public sewer is not available, an approved sewage disposal system shall be provided.

.60.050 Plumbing—Existing and New Construction

- (1) All plumbing in the camp shall conform to the basic plumbing principles of Chapter 94, Rules and Regulations of the State Board of Health governing Sanitation.
- (2) All cross connections, as defined in .54.180(1) of the Rules and Regulations of the State Board of Health are prohibited.

.60.060 Refuse Disposal—Existing and New Construction

- (1) The storage, collection, transportation and disposal of refuse shall be so managed as not to create rodent harborage, insect breeding, or health hazards.
- (2) All refuse shall be stored in clean, fly tight, water tight, rodent proof containers. Lids shall be kept on cans. Such containers shall be located not more than 100 feet from any dwelling unit. Sufficient containers shall be provided for the storage of all refuse.
- (3) Racks, platforms or other devices for the storage of garbage containers shall be provided and so designed as to minimize spillage, facilitate cleaning, and prevent rodent harborage.

.60.070 Rodent and Insect Control—Existing and New Construction—Appropriate measures shall be taken to control rodent and insect infestations.

.60.080 Location and Maintenance — Existing and New Construction

- (1) Labor camps shall be located on well drained sites and where adjacent facilities do not adversely affect the health and safety of camp occupants. They shall be so situated and maintained as not to create a health hazard.
- (2) The grounds shall be maintained in a clean sanitary condition, free from refuse.
- (3) Where sand or dust originating in the camp create problems, provision shall be made for stabilizing the soil.

.60.090 Construction and Maintenance of Dwelling Units

(1) Existing Construction

- (a) Dwelling units shall be structurally sound and shall provide protection for the occupants against the elements.
- (b) Dwelling units shall be constructed so as to provide privacy; and shall be clean and in good repair at each change of occupancy.
- (c) Floors shall be constructed of planed, tight fitting lumber or the equivalent and if elevated, the space underneath shall be kept free of refuse, and shall not be skirted or used for storage.
- (d) Each dwelling unit shall contain at least 70 square feet of floor space for the first occupant and at least 35 square feet of floor space for each additional occupant. At least $\frac{1}{2}$ of the floor area of each habitable room shall have a minimum ceiling height of 7 feet and no floor space with a ceiling height less than 5 feet shall be counted.

(2) New Construction

- (a) Full compliance with .60.090 (1)—(a), (b), and (c).
- (b) Floors of all units not of rodent proof construction shall be raised at least 18 inches above the ground.
- (c) Each room designed or used for sleeping purposes shall contain at least 70 square feet of floor space for the first occupant and at least 50 square feet of floor space for each additional occupant. At least $\frac{1}{2}$ of the floor area of each habitable room shall have a minimum ceiling height of 7 feet and no floor space with a ceiling height less than 5 feet shall be counted.
- (d) All dwelling units shall be provided with adequate storage facilities for occupant's possessions.

.60.100 Ventilation

(1) Existing Construction

- (a) Every living and sleeping room shall be provided with adequate window openings to the exterior.
- (b) Windows shall be openable to at least 45% of their aggregate area: windows and/or doors shall be arranged to provide for cross or through ventilation, except where there is some other approved device provided for ventilation, such as louvered wall vents.

(2) New Construction

- (a) Full compliance with .60.100, (1)—(b).
- (b) Every living and sleeping room shall be provided with window openings to the exterior, having an aggregate area of at least 10% of the floor area.

.60.110 Heating—Existing and New Construction

- (1) When workers are housed during a period requiring artificial heating, all living quarters shall be provided with facilities for maintaining adequate heat, in such a way as to ensure the health and comfort of the occupants.

(2) Heating facilities shall be installed and vented, if necessary, in such a manner as to avoid both a fire hazard and a dangerous concentration of fumes or gases.

.60.120 Lighting

(1) Existing Construction—All rooms used by workers shall be adequately lighted.

(2) New Construction

(a) Full compliance with .60.120 (1).

(b) Where electricity is available, each habitable room in a camp shall be provided with at least one ceiling type light fixture and at least one separate floor or wall type electric convenience outlet.

.60.130 Toilet, Handwashing, Bathing, and Laundry Facilities—Existing and New Construction

(1) Every labor camp shall be provided with adequate toilet, lavatory, bathing and laundry facilities, separated as necessary for the sexes. Only water flush toilets or approved privies will be allowed.

(2) When dwelling units lack integral facilities; central toilet, handwashing, bathing, and laundry facilities shall be provided within 200 feet of all dwelling units being served. Where privies are permitted, they shall be at least 50 feet from any sleeping room, dining room, mess hall or kitchen.

(3) Toilets shall be provided in a ratio of 1 for every 15 occupants or major fraction thereof.

(4) Urinals shall be provided in the ratio of 1 urinal for every 30 males or major fraction thereof. In the case of trough urinals or toilets, 24 inches of length shall be considered the equivalent of one urinal or toilet. Urinals may be substituted for up to $\frac{1}{3}$ of the toilets required for each sex.

(5) Lavatories shall be provided in the ratio of 1 for every 12 occupants or major fraction thereof.

(6) Bathing facilities shall be provided in the ratio of 1 shower head for each 15 occupants or major fraction thereof.

(7) Laundry facilities shall be provided in the ratio of 1 laundry tray or wash tub or other type laundry facility for every 25 occupants or major fraction thereof. Adequate clothes lines shall be provided.

(8) Where central facilities are required, the number of fixtures provided for each sex shall be based on the maximum number of that sex dependent on such facilities, which the camp is designed to house at any one time.

Adequate dressing space adjacent to bathing facilities shall be provided.

(9) The walls of rooms containing toilet, lavatory, bathing, or laundry facilities shall be well constructed with an interior finish of light colored, water impervious material, to a point above the level of splash and spray.

(10) The floors of rooms containing toilet, lavatory, bathing and laundry facilities shall be of water impervious material, smooth, easily cleanable, and sloped to floor drains connected to a suitable disposal system.

(11) All toilets, shower and laundry rooms shall be well lighted and ventilated.

.60.140 Foodhandling Facilities—Existing and New Construction — In labor camps where there is a central establishment provided for the serving of food, such eating establishments shall comply with the Rules and Regulations of the State Board of Health governing Food Establishments.

.60.150 Beds and Bedding—Existing and New Construction

(1) Sleeping facilities shall be provided each dwelling unit occupant and shall consist of a bed or bunk. Where mattress, blankets, and linen are provided, they shall be clean and sanitary when issued.

(2) Each bed or bunk shall clear the floor by at least 12 inches. Single beds shall be spaced not closer than 36 inches laterally. Double deck bunks shall be spaced not closer than 48 inches laterally. The top mattress of a double bunk shall clear the ceiling by at least 36 inches. The bottom mattress of a double bunk shall clear the bottom of the top bunk by at least 36 inches.

.60.160 Supervision and Responsibility—The owner or his designated agent shall maintain the camp in a clean and sanitary condition and in good repair. The owner or his designated agent shall familiarize himself with these rules and regulations.

.60.170 Communicable Disease—The owner or his designated agent shall exercise reasonable efforts to know of the presence of communicable disease within the camp and when such is suspected shall report this to the health officer.

.60.180 Effective Date—These rules and regulations are to become effective March 1, 1961. In the interim, compliance with these standards to the extent possible is recommended. Issuance of a provisional permit subsequent to March 1, 1961 will be contingent upon development of a plan and time schedule for compliance with the requirements of these rules and regulations which is acceptable to the health officer. (Addition 5-27-60)

TABULATION OF RESPONSES TO LABOR CAMP QUESTIONNAIRE, AUGUST 1-61

	Benton Franklin	Bremerton Kitsap	Chelan Douglas	Grant	Klickitat	Okanogan	Olympic	Pierce	Seattle King	Skagit	Snohomish	Yakima	Walla Walla	Bellingham Whatcom	Whitman
Existing No. of Camps Within Jurisdiction as Defined by Rules	16	16	125	8	2	80	3	57	24	48	8	57	6	38	1
Total No. of Camps Inspected to Date	16	15	101	7	2	70	3	136	23	47	8	53	6	38	1
No. of Camps Issued Provisional Permits to Date	16	15	40	5	0	70	1	11	21	46	5	25	1	30	0
No. of Camps Issued Full Permits to Date	0	0	61	1	0	0	2	0	2	1	3	26	4	0	0
% of Total Camps Issued Permits	100	94	81	75	0	88	100	18.4	96	98	100	89	83	79	0
Approximate No. of Man Hours Devoted to Program this Year	50	23	200	80	30	320	30	163	600	288	45	300	120	100	1
Approximate No. of Man Hours Anticipated to be Devoted to Pro- gram Annually	50	23	250	120	40	320	30	163	320	225	45	300	84	100	5
Average Man Hours per Labor Camp Devoted to Program this Year	3.1	1.5	2.0	11.4	40.0	4.5	10.0	1.2	26.1	6.3	5.6	5.7	20	2.6	1

SOME ADDITIONAL COMMENTS

Benton-Franklin District Health Department - More active part played by the rest of agencies involved in this matter. Sanitarians alone can not accomplish (all the aims of) this program. There is more to this than just requirements to be fulfilled. Educators, social workers, health educators, sanitarians, nurses, church groups, etc., should be out in the field if these regulations are to be maintained and standards kept up accordingly.

Bremerton-Kitsap County Health Department - Most pickers in this area are Indians from Canada. Considering the conditions under which they live at home and the very short time they are here, some of the housing requirements seem a little high.

Chelan-Douglas Health District - Due to the freezing of some of the crops earlier this spring, we anticipate a set-back in the compliance schedules we have set up with some of the ranchers.

Grant County Health Department - Problems which we have run into here in Grant County are that the regulations require better housing for the migrants than many of the farmers seem able to afford because of a new development area. Many farmers only want migrant help for a few days at a time and indicate that they can't afford to build housing for such short duration. Many get around the regulations by housing less than 10 men.

Okanogan County Health Department - Program seems to be popular and has been readily accepted. There might be more (specific treatment) in the regulations on use of trailer houses, particularly the World War II kind used for permanent housing.

Tacoma-Pierce County Health Department - Our biggest problem is not having enough time to devote to the program. Also, most of the farmers have abandoned most of their cabins and have used "drive-out" pickers. However, they all seem to want one or two families to stay on the place and some of the old cabins are used. In this way they have less than 10 people in housing but the housing is still capable of holding more than 10.

Seattle-King County Health Department - The rules, regulations, and standards of the State Board of Health appear to be adequate as they apply to public health problems within the boundaries of the labor camp. However, outside the camps, in the fields where the crops are raised and harvested, it has been observed that there are inadequate, insanitary toilets and unsafe drinking water. It would be desirable if regulations were adopted to cover the sanitation problems in the field.

In carrying out an effective long term labor camp program, the State Health Department, other state, federal, and/or local agencies can assist the local health department by providing additional funds, which would subsidize new programs and additional responsibilities which are given to local health departments by state laws, rules and regulations.

Skagit County Health Department - Inspections of camps during operation indicate that perhaps too much emphasis is being placed on plant facilities and not enough effort toward basic items of sanitation, including supervision and maintenance of camps.

Snohomish Health District - Nothing is mentioned on the application or inspection forms concerning inadequate electrical wiring. This is not a health problem but definitely a safety precaution. I found 75% of our labor camps in this county a hazard in that respect.

Yakima County Health District - None.

Bellingham-Whatcom Health District - Field sanitation regulations needed together with enforcement (of labor camp rules). We have insufficient personnel and funds to do the kind of job needed and/or to make the field sanitation inspections required during operational periods. We can not take or make responsibility in the area or move more rapidly because of lack of funds.

WSDH:ES

12/18/61:200