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via https://aq.ecology.commentinput.com/?id=TFRmdr9kj&utm_medium=email&utm_source=govdelivery

Washington State Department of Ecology
Air Quality Program
300 Desmond Drive SE
Lacey, WA 98503

RE: Draft 2026 Budget and Fee Schedule for Some Air Quality Permits

To Whom It May Concern:

The 18.5% increase in hourly and flat fees for the 2-year biennium is excessive and the hourly fee should be closer to \$126, affecting a 6% increase in flat fees.

First, Department of Ecology (Ecology) personnel are not increasing their earning potential by 18.5% and Ecology is not a for-profit organization, so the biennial increase should be commensurate with the projected direct and indirect costs for the employees working on NSR permits.

- Social Security Administration recognized a total COLA increase of 5.7% for 2024 and 2025¹ and that is consistent with the 6% total Washington State Office of Financial Management's Wage Adjustment and Salary Increase for the same 2-year period².
- Rather than direct Wage Adjustments, Department of Ecology (Ecology) employees generally earn step increases annually (5 to 10% over 2 years) until they max out their job classification.
- All of the above biennial period increases are less than the proposed increase.

Second, while Environmental Engineer 5 (EE5) is the most common job class based on 5 years of historical data at 41.3% of the NSR direct hours, Environmental Engineer 3 (EE3) contributed 40.9% of the NSR direct hours, so using the higher cost schedule is not reasonable representative of the cost to process an NSR permit and a weighted value should be incorporated. Furthermore, according to Washington State's job descriptions³, an EE5 "directs a large environmental unit and supervises nine or more staff which includes at least three environmental engineers performing environmental engineering duties. Position represents the department as a registered Professional Engineer." or "a senior environmental engineering specialist, plans, and conducts investigations of, and proposes solutions to environmental engineering

¹ <https://www.ssa.gov/news/en/cola/index.html>

² <https://ofm.wa.gov/state-human-resources/workforce-data/compensation/wage-adjustments-and-salary-increases>

³ <https://ofm.wa.gov/state-human-resources/compensation-job-classes/ClassifiedJobListing/Specifications/545>



problems that require the research and application of environmental engineering techniques and principles within a specialty field.”

- It is inappropriate to assign Environmental Engineer 5 as the cost basis for New Source Review Permits since the assumption that a manager of 9 or more, or a senior environmental specialist, would be the primary technical support for every New Source Review (NSR) application.
- Moreover, most of the regional offices issuing air permits have one 2 to 3 EE3 for each EE5, so there should be more time allocated to EE3 for NSR than shown in the budget
- Therefore, the annual salary and wages should be an average of projected EE3 and EE5 salaries.

Third, the “Draft Budget for Air Quality Permits” adds “Intra-Agency Reimbursements” to determine the total cost per hour. If the “Intra-Agency Reimbursements” are reimbursements from local air agencies or other departments within Ecology for permitting support, then the reimbursement should be removed from the draft budget table since that is not a direct or indirect cost to the NSR program. Moreover, this amount reduces the time spent and the amount that sources permitted by Ecology should be required to pay to Ecology.

Fourth, while WMS Band2 provides the most common job class for NSR management at 60% of the NSR direct hours, WMS Band1 contributed 40% of the NSR direct hours. Again, Ecology is not a for-profit organization so using the higher cost schedule is not appropriate and a weighted value should be incorporated.

Notwithstanding the comments above, please note that:

- 1) The draft budget does not substantiate why 5.11% of an Environmental Education – Outreach Specialist 3 (COEES 3) is included as a direct cost of NSR permitting. This is an indirect cost and is likely included in the indirect rates.
- 2) The draft budget does not provide resources to review how the 2024 budget compared to actual expenses.
- 3) The draft fee schedule does not substantiate the number of hours for the initial fee for Tables 1 and 2 or Tables 3 through 11 of WAC 173-455-120.
- 4) The draft fee schedule does not provide the proposed fee changes for SEPA, Tables 4 and 5 of WAC 173-455-120.

It is important that Ecology consider that the businesses affected by these proposed fees are not likely to increase their staff or revenue at these percentages. Ecology should not be a driving force



for inflation but an organization working in concert with businesses, communities and government agencies to protect the environment.

Thank you for your consideration of these comments. If you have any questions, please contact me. Otherwise, I look forward to reviewing Ecology's response to the public comments later this fall.

Sincerely,

Beth Fifield Hodgson

Beth Fifield Hodgson
Principal Engineer