



King County

Department of Natural Resources and Parks
Wastewater Treatment Division

King Street Center, KSC-NR-5501
201 South Jackson Street
Seattle, WA 98104-3855

May 11, 2023

Ligeia Heagy
Washington State Department of Ecology
Water Quality Program
P.O. Box 47600
Olympia, WA98504-7600

Dear Ms. Heagy,

Thank you for the opportunity to comment on the Washington State Department of Ecology's (Ecology) proposed increase to municipal wastewater permit fees as part of the update to the water quality permit fee rule. We also appreciate the opportunity to serve on the Stakeholder Advisory Group on this subject.

While King County's Wastewater Treatment Division (WTD) supports adequate funding for Ecology's work related to the fees, the proposed increase from \$0.18 to \$0.29 per residential equivalent (RCE) per month or \$3.43 per RCE annually is substantial. For example, in fiscal year 2022, WTD paid Ecology \$1,705,844 to administer permits for five treatment plants. The proposed increase will add approximately \$1 million annually which will be paid by WTD's ratepayers. This comes at a time when the burdens to comply with regulatory requirements, keeping up with an aging system and demands for capacity improvements are all falling on ratepayers, without sufficient relief from the state.

We believe that substantial cost increases must be accompanied by substantial increases in Ecology's services, such as reduced permit backlog and improved responsiveness. Also, while all permittees will pay more with this proposal, the difference between Ecology's actual costs to issue a permit and the permit fee charged to agencies serving larger numbers of RCEs will be further increased. While the passage of Senate Bill 5585 removed the cap per RCE in the Revised Code of Washington on municipal wastewater discharge permit fees, Ecology should consider no further increases beyond the current proposal until it can demonstrate the permit fee reflects the actual cost of service based on verifiable data to inform permit fee amounts.

As suggested during the Stakeholder Advisory Group meeting, we strongly urge Ecology to track staff time and administrative costs for each permit going forward. This information would serve as the basis for Ecology to implement a true "cost of service" permit fee structure for municipal


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wastewater permit fees that is equitable for all agencies and ratepayers. The data should be shared with the Stakeholder Advisory Committee, in advance of their next meeting in 2024, to inform fee structure options for 2025.

Ecology is tasked with reducing the permit backlog to 40 percent by 2025 and 20 percent by 2027. We look forward to Ecology reporting back to the Stakeholder Advisory Committee on progress made towards this important goal.

Thank you for considering our comments. If you have any questions regarding our comments, please contact me at 206-549-1190 or kgurol@kingcounty.gov.

Sincerely,

DocuSigned by:


Kamron Gurol

Division Director