



Northwest Pulp & Paper ASSOCIATION

May 20, 2025

Submitted online via <https://wq.ecology.commentinput.com/>

Mr. Matthew Tietjen
Water Quality Program
Washington Dept. of Ecology
300 Desmond Dr SE
Olympia, WA 98504

Dear Mr. Tietjen,

Thank you for the opportunity for the Northwest Pulp & Paper Association (NWPPA) to provide comments on Department of Ecology's (Ecology) proposed Water Quality Permit Fees.

NWPPA is a 69-year-old regional trade association representing 11 member companies and 13 mills in Oregon, Washington and Idaho, seven of which are located in Washington. Our member mills in Washington provide roughly 4,000 union-backed, family wage jobs in some of Washington's more rural, economically distressed communities. Mills provide a 3:1 job multiplier and are often the single largest taxpayer in these communities, a large portion of which is distributed as funding for schools and emergency services.

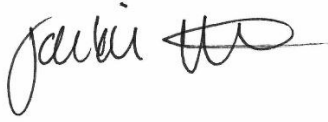
Washington's pulp and paper industry has historically borne some of the highest water quality permit fees of any permitted sector, and the proposed 4% increase over the biennium is a continuation of this trend. According to RCW 90.48.465, program fees "shall be established in amounts to fully recover and not to exceed expenses incurred by the department in processing applications and modifications, monitoring and evaluating compliance with permits, conducting inspections, securing laboratory analysis of samples taken during inspections, reviewing plans and documents directly related to operations of permittees, overseeing performance of delegated pretreatment programs, and supporting the overhead expenses that are directly related to these activities." Respectfully, NWPPA believes that the proposed fees for pulp and paper exceed the amounts necessary to facilitate Ecology's mandate.

NWPPA and our members understand that the effects of inflation and increased costs have impacted all sectors of the economy, but there are ongoing concerns with growing disparities in permit fees. Industrial permits can be complex; however, they typically require less ongoing time and support from Ecology staff. Conflictingly, Ecology typically devotes greater resources to smaller permittees who may not have dedicated staff with the necessary expertise. It is our understanding that there has previously been a shared intent to close the gap in order to ensure that one group of permittees is not effectively subsidizing another. However, the proposed fee increase appears to widen the gap, rather than narrow it. With this in mind, it may be time to re-evaluate program funding sources to ensure that the true costs associated with smaller entities are enough to cover the costs of supporting those permittees.

NWPPA requests that Ecology provide an analysis of the actual costs associated with facilitating permits for each category during the 2023-2025 biennium in order to more clearly understand the predicted costs associated with Ecology's work in the 2025-2027 biennium.

Thank you for the opportunity to provide feedback. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jackie White", with a stylized flourish at the end.

Jackie White
Director of Regulatory and Technical Affairs, NWPPA