



Response to Comment for Amendments to the Consolidated Fee Schedule

Summary of rulemaking and response to comments

Introduction

The purpose of a Response to Comment is to:

- Provide reasons for adopting the amendments.
- Describe any differences between the proposed amendments and what was adopted.
- Provide Spokane Regional Clean Air Agency’s (SRCAA) response to public comments.

Reason for Adopting the Fee Adjustments

Rising costs to administer fee-based programs prompted SRCAA Boards of Directors to amend several sections of the Consolidated Fee Schedule to work toward the Boards long-standing goal of full cost recovery.

Section	Section Title	Action
10.06(B)	Annual Registration Fees	Increase 15% to bring the registration fee program closer to full cost recovery
10.06(C)	Annual Air Operating Permit Fees	Increase the emissions fee portion 30%. This does not increase the total fee, but realigns the fee so that emissions fee is about 1/3 of total fee.
10.07	Notice of Construction (NOC) and Portable Source Permit (PSP) Fees	Increase 10% to ensure the program remains at full cost recovery
10.07(A)(1)(c)	Fee for Additional NOC/PSP Review Hours	Increase hourly rate 10% to align with NOC fee increase
10.07(A)(2)	Fee for Replacement of Substantial Alteration of Control Technology and for Changes to Order of Approval or Permission to Operate	Increase hourly rate and minimum fee for revision 10% to align with NOC fee increase

Section	Section Title	Action
10.08(A)	Miscellaneous Fees	<p>Have only 1 hourly rate.</p> <p>Increase hourly rate 10% to align with NOC fee increase.</p> <p>Adjust variance filing fee to 3x hourly rate, must be paid upon submittal of application</p>
10.13	Outdoor Burning Waiting Period and Fees	Increase hourly rate 10% to align with NOC fee increase.

Differences Between the Proposal and Adopted Consolidated Fee Schedule

There were no changes between the proposal and the October 6, 2022 Consolidated Fee Schedule adopted by Spokane Regional Clean Air Agency Board of Directors.

Response to Comments

Spokane Regional Clean Air Agency held a public 40-day comment period, excluding one holiday. The agency accepted comments between August 28, 2022 and October 6, 2022. A public hearing was held during the Spokane Regional Clean Air Agency Board of Directors meeting on October 6, 2022.

Notice of comment period and hearing outreach included:

- August 28 – October 6, 2022: Published on Spokane Clean Air’s website “hearings and notices” section
- August 28, 2022: Published a notice in the Spokesman Review
- August 29, 2022: Mailed postcard to Spokane Clean Airs registered sources
- August 29 – September 7, 2022: Distributed by email to Spokane Clean Air’s regulatory update and business assistances list serves; email to regulatory and community partners; and email to registered sources and AOP sources
- October 2, 2022: Published a notice in the Spokesman Review on
- October 6, 2022: Public hearing

The agency received six inquiries from affected businesses about what the amended fees would look like for their facility.

One written comment was received. No oral comments were given during the public hearing.

Marcy Cockle marcyac@centurytel.net:

"I am a small business voicing my choice on increasing fees.

We are already struggling with COVID pandemic recovery,, minimum wage increasing, gas increasing, increasing materials, and increasing utilites.

WE CAN NOT HAVE ANOTHER FEE INCREASE. SMALL BUSINESS ARE BEARY SURVIVING.

NO MORE FEE INCREASES.

Marcy Cockle

Cockle Custom Welding"

Spokane Regional Clean Air Agency (SRCAA) Response:

Registration fees were last revised in 2016. COVID recovery and inflationary increases are affecting operations throughout Spokane County. SRCAA projected a shortfall of \$128,000 for this current Fiscal Year (FY2023). The shortfall will continue to increase each year if fees are not adjusted. Amendments to the fee schedule are necessary to facilitate the goal of full cost recovery. SRCAA's Board of Directors instructed the agency to limit the increase to no more than 15%. And understanding that this limit is projected to recover 57% of the projected shortfall.