

WHATCOM COUNTY COMMISSION ON SALARIES
FOR ELECTED OFFICIALS

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AGENDA

Monday, March 1, 2021, 4:00 p.m. to 6:30 p.m.

- A. CALL TO ORDER

- B. APPROVAL OF FEBRUARY 15, 2021 MINUTES

- C. PUBLIC COMMENT

- D. GENERAL COMMENTS FROM THE CHAIR

- E. DISCUSSION OF DATA RECEIVED TO-DATE
 - Questions/Comments on Requested Data from HR Dept
 - Thoughts on Elected Officials Presentations
 - Summary Spreadsheet Review
 - Any Additional Data Requests

- F. NEXT STEPS

- G. ADJOURN

Future Meeting Dates: March 15, April 5 & 19, 4:00-6:30 pm

EOS-1 Corrected

WHATCOM COUNTY PROSECUTING ATTORNEY

ERIC J. RICHEY

CHIEF CRIMINAL DEPUTY
Erik Sigmar

ASST. CHIEF CRIMINAL DEPUTY
Warren Page

CRIMINAL DEPUTIES
David Graham
Dona Bracke
Melissa Stone
Kellen Kooistra
Benjamin Pratt
Gordon Jenkins
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Royce Buckingham
Christopher Quinn
George Roche
Brandon Waldron

CIVIL SUPPORT
ENFORCEMENT DEPUTIES
Janelle Wilson/Lead
Dionne Clasen

APPELLATE DEPUTIES
Kimberly Thulin
Hilary Thomas

ADMINISTRATOR
Vanessa Martin

February 24, 2021

RE: ELECTED PROSECUTOR SALARY

INTRODUCTION

Dear Salary Review Commission,

Thank you for volunteering your time and expertise in the critical service of reviewing Whatcom County elected officials salaries and ensuring they are fixed in accordance with the county code, county charter and state law and commensurate with the duties expected of each office. I greatly appreciate the time you are giving to help make our community a better place. As you embark on your deliberations, process, and eventual decisions, I respectfully submit this letter to you as background information about the role of the Prosecutor and the related codes for your consideration. I am committed to presenting this information to you in a transparent way and will make myself available for follow-up questions and further discussion.

Commented [HF1]: <https://www.whatcomcounty.us/576/Salary-Commission>

DISCUSSION

The elected prosecutor's salary reflects the State of Washington's and the County's desire to attract the best candidates for this important elected attorney position.¹ It also reflects the responsibility of the employer to provide appropriate compensation commensurate with the tremendous statewide and local

¹ RCW 43.03.027

Salaries of public officials—State policy enunciated.

It is hereby declared to be the public policy of this state to base the salaries of public officials on realistic standards in order that such officials may be paid according to the true value of their services and the best qualified citizens may be attracted to public service. It is the purpose of this section and RCW 43.03.040 to effectuate this policy by utilizing the expert knowledge of citizens having access to pertinent facts concerning proper salaries for public officials, thus removing and dispelling any thought of political consideration in fixing the appropriateness of the amount of such salaries.

responsibilities placed on an elected prosecutor. Finally, the prosecutor's salary represents respect for the office, as it is intended to reflect the idea that the office carries importance/prestige equal to that of a superior court judge.

This concept is important enough, that the method of calculating an elected prosecutor's salary is described in state law—the State pays half of the prosecutor's salary and the legislature explicitly articulates in law that elected county prosecutors should be paid commensurate with superior court judges regardless of the population/size of the county.

RCW 36.17.020 - Schedule of salaries.

The county legislative authority of each county or a county commissioner or council member salary commission which conforms with RCW 36.17.024 is authorized to establish the salaries of the elected officials of the county. The state and county shall contribute to the costs of the salary of the elected prosecuting attorney as set forth in subsection (11) of this section. The annual salary of a county elected official shall not be less than the following:

(1) In each county with a population of one million or more: Auditor, clerk, treasurer, sheriff, members of the county legislative authority, and coroner, eighteen thousand dollars; and assessor, nineteen thousand dollars;

(2)-(10) *(These sections set bare minimums for elected officials other than prosecutors, based upon the population of the county.)*

(11) **The state of Washington shall contribute an amount equal to one-half the salary of a superior court judge towards the salary of the elected prosecuting attorney.** Upon receipt of the state contribution, a county shall continue to contribute towards the salary of the elected prosecuting attorney in an amount that equals or exceeds that contributed by the county in 2008.

Findings—2008 c 309: "The legislature finds that an elected county prosecuting attorney functions as both a state officer in pursuing criminal cases on behalf of the state of Washington, and as a county officer who acts as civil counsel for the county, and provides services to school districts and lesser taxing districts by statute.

The elected prosecuting attorney's dual role as a state officer and a county officer is reflected in various provisions of the state Constitution and within state statute.

The legislature finds that the responsibilities and decisions required of the elected prosecuting attorney are essentially the same in every county within Washington state, from a decision to seek the death penalty in an aggravated murder case, to the decision not to prosecute but refer an offender to drug court; from a decision to pursue child rape charges based solely upon the testimony of the child, to a decision to divert juvenile

offenders out of the justice system.² **Therefore, the legislature finds that elected prosecuting attorneys need to exercise the same level of skill and expertise in the least populous county as in the most populous county. The legislature finds that the salary of the elected county prosecuting attorney should be tied to that of a superior court judge.**³ This furthers the state's interests and responsibilities under the state Constitution, and is consistent with the current practice of several counties⁴ in Washington State, the practices of several other states, and the national district attorneys' association national standards." [2008 c 309 § 1.]

Prior to 2017, the Whatcom County Prosecutor's salary matched the Washington Superior Court Judicial salary. Contrary to legislative policies, the 2017 Whatcom County Salary Commission "untethered" the salary of Whatcom County's elected Prosecutor from the Washington Superior Court Judges, creating a salary imbalance that formed when the Washington State Superior Court Judges received salary increases in 2018. The imbalance happened because most elected prosecutor salaries in Washington are tied to or match the Washington Superior Court Judicial Salaries.⁵ In 2019, the Whatcom County Salary Commission retied the Whatcom County Prosecutor to the Washington Superior Court Judges, but instead of matching salaries, the 2019 Whatcom County Salary Commission set the Prosecutor salary at \$5000 less than the Superior Court Judges.⁶ While not matching, the 2019 Salary Commission course-corrected when they retied the salaries, which is the intent of the Washington Legislature, who stated in their findings of RCW 36.17.020:

"The legislature finds that the salary of the elected county prosecuting attorney should be tied to that of a superior court judge. This furthers the state's interests and responsibilities under the state Constitution, and is consistent with the current practice of several counties in Washington State, the practices of several other states, and the national district attorneys' association national standards."

This Commission should consider matching salaries again.

Whatcom County Prosecutor is a full-time position, not part-time as in a small jurisdiction. The Whatcom County Prosecutor manages a team of 24 attorneys and 25 staff. The case loads are high. The

² These decisions are important and serious and are designated only to prosecutors to decide. A judge cannot make these decisions.

³ "Tied" means to bind, fasten or attach.

⁴ These "several counties" include all six of the comparable counties designated by Whatcom County. Four of the comparable counties match the prosecutor salary to the Washington Superior Court Judicial salaries, and the two smaller counties have formulas to tie their prosecutor salary to the Superior Court Judges.

⁵ Overall, 23 county prosecutor salaries are tied to the Superior Court Judges. 11 counties match or go above the Superior Court Judge salaries, they include: King, Pierce, Snohomish, Clark, Grant, Spokane, Thurston, Kitsap, Benton, Mason and Yakima. King and Pierce pay their prosecutors more than a Washington State Superior Court Judicial salary. Small rural counties pay lower salaries to their prosecutors, despite the legislative intent.

⁶ After the 2019 Salary Commission made this decision, they quickly decided to match the Executive salary to the Prosecutor.

Prosecutor runs fully staffed criminal *and* civil divisions. Few attorneys in Whatcom County (perhaps *no* attorney in Whatcom County) have duties as onerous or important as that of the elected prosecutor.⁷ Even judges, as important as their decisions are, do not supervise a large number of both attorneys and staff. Additionally, any private practice attorney managing over 20 attorneys and 20 staff would be a lead partner in a substantial law firm and earn *significantly* more than the state's presumptive salary for elected prosecutors.

The presumptive pay is not extravagant for the duties performed, and the pay for the position does not exceed what is warranted. To this end, it is important to remember the following:

- The job of elected prosecutor is not comparable to that of other elected County officials, or the Public Defender conceptually or legally.⁸
- The job of elected prosecutor is comparable to that of a superior court judge conceptually by power due to prosecutor discretion⁹ and by law, as above.¹⁰
- Other elected County officials have minimum salaries tied to the population of the county. The legislature explicitly states that the population of the county in which the prosecutor serves does not affect the job they do; indeed, the State pays the same amount for every elected county prosecutor in the state, just as it does for elected Judges.¹¹
- The prosecutor is required to obtain a bachelor's degree and a Juris Doctorate degree just to qualify for the job, and must be in good standing with the Washington State Bar Association.
- The prosecuting Attorney operates independently of the County administration and does not work for the County Executive.¹² The elected prosecutor is not an inferior (or superior) position to the Executive. It is a separate branch of government (quasi-judicial). The elected Prosecutor's decisions are final.
- The County only pays half of the elected prosecutor's salary. The Prosecutor is not an extravagance or even a particularly expensive position for Whatcom County to fund in the manner the legislature has outlined.¹³ In fact, the County pays much less for its prosecutor's services than it does for other elected officials, such as the County Executive.

⁷ In addition to courtroom and administration work, prosecutors are on-call 24 hours a day to respond to serious crimes, such as murder. Prosecutors and their families subject themselves to threats due to the work that the prosecutor performs. Prosecutors across the country and in Washington State have been murdered by those who object to their attempts to protect the public.

⁸ The Prosecutor represents the State of Washington in all felonies, misdemeanors within the County, and juvenile matters. The Prosecutor represents each County department, including the public defender, in contracts and civil disputes. The Prosecutor represents the State of Washington in child support cases. Decisions are final with the elected prosecutor who is beholden only to the electorate. The Whatcom County Prosecutor oversees 49 employees. The Whatcom County Public Defender only represents indigent clients and has 32 employees.

⁹ Prosecutorial discretion is the power to file charges, decide which charges to file or to not file any charges at all. A judge or party cannot interfere with a prosecutor's discretion, unless charges are not supported by evidence.

¹⁰ RCW 36.70.020

¹¹ RCW 36.70.020(11)

¹² To illustrate the separation of powers, the prosecutor could both file a civil suit and/or file charges against the county executive, employees serving under the county executive or against the superior or district court judges.

¹³ The State provides half of what the State pays a superior court judge to counties for the county to pay the county prosecutor. RCW 36.17.020(11).

- The race for prosecutor can be hotly contested, leading to uncertainty about longevity, both of which are deterrents to potential candidates.¹⁴ These “deterrents to public service” are offset by a salary that signals that the position of elected prosecutor is on par with the prestige and respect of a superior court judge.

Whatcom County has been a careful steward of public funds. There may be a political temptation to keep salaries of the elected prosecutor down to show the public that the County is frugal and careful with tax dollars.¹⁵ However, by doing so Whatcom County is inadvertently signaling that the position of elected prosecutor in Whatcom County is not worth the same as the position of superior court judge. This significantly devalues the position in the eyes of judges and others in the courtroom and it devalues the position to potential candidates who might run for county prosecutor. Some good candidates may consider salary heavily when deciding to take the very risky step of running for office. Most elected officials run for office because they are inspired by public service and at the same time, ensuring that salary is commensurate to duties, responsibilities and is aligned with the State’s recommendations removes barriers for good candidates to consider the very risky step of running for office.

Whatcom County has enjoyed stability in the Prosecutor’s Office over the years.¹⁶ However, good, effective prosecutors will be apt to run for judge if a judicial position is deemed more prestigious or more desirable financially.¹⁷ Turnover in the Prosecutor’s Office (when it is not a product of the will of the people) is a bad thing and something that should not be encouraged here, because longevity creates experience and efficiencies that cannot be taught.

COMPARABLE ANALYSIS

Whatcom County is the ninth most populous county out of 39 counties and ninth in expenditures.¹⁸ Its assessed value is seventh of 39. Whatcom County is not Columbia County or Whitman County. The standard salary set by the State Legislature is not a standard only for King County. It is a standard for all counties, and the law explicitly says so in its findings. *See above*. The specific finding by the State Legislature that counties should tie their elected prosecutor salary to that of judges is not mandatory in part because there are tiny counties in which the elected Prosecutor has fewer duties, very few staff, and low case-loads. Whatcom is not a tiny county.

Government human resource offices often compare salaries from other counties to determine wages for its employees. To determine county employee salaries, Whatcom County compares employee

¹⁴ Risks of running for public office include: time and expense of running for office every four years, potential unemployment without unemployment insurance, additionally, elected officials receive no vacation or sick leave accruals.

¹⁵ See RCW 43.03.027 which prohibits political considerations.

¹⁶ As an example of the contrary, Skagit County had decades of rapid turnover in the past, and several good Prosecutors served a term or two and then ran for Judge.

¹⁷ In 2020, Whatcom County lost two deputy prosecutors to the local superior court bench. One became a superior court judge, and one became a superior court commissioner.

¹⁸ Whatcom County Salary Commission 2018 Salaries Sorted by Population.

wages to wages of similar employees¹⁹ in six designated counties, which are: Thurston, Kitsap, Yakima, Benton, Skagit and Cowlitz, but this method is not based in law. The comparable county list came from a 2001 Whatcom County Correction Officer union arbitration. Arbitrators chose the comparable counties based on similar populations and economics to Whatcom at the time. In 2001, both Whatcom's and Cowlitz's largest cities were "mill towns." As most know, Georgia Pacific left Whatcom County years ago and Whatcom County has grown and thrived. On the other hand, Cowlitz economy continues to rely on mills in its largest city, and continues to struggle financially.²⁰ From 2000, to 2019, Whatcom grew 37.5% in population, while Skagit only grew 25.5% and Cowlitz just 19%.²¹ When the Whatcom County Human Resources Department (HR) performs a salary realignment (a process to compare wages to comparable county wages), by practice the HR Department removes the one low outlier from the comparable county analysis. In considering comparability, you may consider removing Cowlitz County from your calculation.²²

Whatcom County is the fourth most populous of the seven comparable counties, and Whatcom is the median in size and 5% larger than the average.²³ The population of the first four counties is between 90% and 128% of Whatcom County (statistically close). The lowest two, Skagit and Cowlitz are a mere 57% and 49% of Whatcom County's population, respectively (not statistically close). If the Commission considers assessed values to determine Whatcom's reasonable comparable counties, Cowlitz County would not make the list of six comparable counties. In looking at a list of all county valuations and thinking about the comparable counties, Whatcom is second behind Thurston in valuation, and Cowlitz is eight spots below Whatcom.²⁴ In early 2018, all five of the truly comparable counties including Whatcom paid their prosecutors the same as a Washington State Superior Court Judge.²⁵ Of all the comparable counties, only the Whatcom County Prosecutor salary has regressed since 2017, and there was no logical or financial reason for regression.

Cost of living is not a favored analysis by the Whatcom County HR Department and was not considered by the 2019 Whatcom County Salary Commission, although other salary commissions in Washington will consider cost of living to determine salaries.²⁶ A quick internet search reveals that only one designated comparable county, Kitsap has a higher (only slightly) cost of living than Whatcom

¹⁹ Similar employees mean other elected prosecutors. Similar employees do not include heads of other departments such as directors of public defender organizations. Similar employees are not chief deputies in the Whatcom County Prosecutor's Office. Salary compression is not a problem in the Whatcom County Prosecutor's Office. Instead, chief deputies in this office need raises, which I intend to fight for again.

²⁰ Cowlitz is less than half the size of Whatcom, and has a much lower cost of living. One may wonder why Cowlitz remains as a Whatcom County designated comparable.

²¹ US. Census Bureau Data.

²² For what it is worth, Cowlitz County does not consider Whatcom County to be one of their designated comparable counties. Cowlitz's comparable counties are: Lewis, Skagit, Grays Harbor, Clallam, and Grant.

²³ *Whatcom County Salary Commission 2018 Salaries Sorted by Population.*

²⁴ Assessed valuation information provided by Whatcom County Human Resources to the 2019 Salary Commission.

²⁵ After 2018, the Whatcom Prosecutor salary lagged behind other prosecutors when the Washington State Superior Court Judicial salaries increased. This happened due to the 2017 Whatcom County Salary Commission who "untethered" the Whatcom County Prosecutor salary from the Washington State Superior Court Judicial salary.

²⁶ See the Washington Citizen's Commission for Salaries for Elected Officials for an example of a commission considering cost of living.

County.²⁷ The remaining counties all have lower cost of living expenses, with Yakima, Benton, and Cowlitz Counties having a significantly lower cost of living than Whatcom County.

Superior court judge salaries will rise on July 1, 2022 under the authority of The Washington Citizen's Commission for Salaries for Elected Officials and by statute.²⁸ Yakima, Benton, Thurston, and Kitsap will continue to use the practice of matching their prosecutors to the Washington Superior Court salaries as Whatcom did until 2017. The smaller counties, Skagit and Cowlitz use a formula to tie their prosecutor to the Washington State Superior Court Judicial salaries.

Salaries compared

Washington State Superior Court Judges, and Prosecutors for Thurston, Kitsap, Benton and Yakima:

1/1/2021 annual salary \$199,675 / monthly salary \$16,639.58.

7/1/2022 annual salary \$203,169 / monthly salary \$16,930.75.

Cowlitz: calculation is based on the state contribution as of Jan 1 (50% of superior court judge) and 84% of 50% of district court judge. **Please note that Cowlitz elected official salaries are based on a 37.5-hour work week.**²⁹

1/1/2021 annual salary \$179,688 / monthly salary \$14,974.00. Adjusted salary based on 40-hour week is: annual salary \$191,673.60 / monthly salary \$15,972.80.

7/1/2022 annual salary \$182,832 /monthly salary \$15,236.02. Adjusted salary based on 40-hour week is: annual salary \$195,014.40 / monthly salary \$16,251.20.

Skagit: Calculation is 95% of the Superior Court Judges. (their formula is slightly different in that it calls for a county contribution based on the state superior court judge salary as of Jan 1 each year, but also allows any additional state increase to be passed on to the prosecutor mid-year.)³⁰

1/1/2021 annual salary \$189,691 / monthly salary \$15,808.00.

7/1/2022 annual salary \$193,011 / monthly salary \$16,084.21.

Whatcom: The 2019 Whatcom County Salary Commission decided that the Whatcom County Prosecutor would be paid \$5,000 less than the Superior Court Judges.

1/1/2021 annual salary \$194,675 / monthly salary \$16,222.92.

7/1/2022 salary?

²⁷ Cost of living for each comparable county found on "bestplaces.net"

²⁸ RCW 43.03.012 The Washington Citizen's Commission for Salaries for Elected Officials recently increased all State elected officials, including the Superior Court Judge's salary to 203,169 starting 7/1/2022

²⁹ Whatcom County salaries are based on a 40-hour work week compared to Cowlitz's 37.5-hour work week. Both elected prosecutors are required to work any and all hours necessary to get the job done, but the discrepancy in hours per work week is another example of why Cowlitz County is not a good comparable. If Cowlitz County is used as a comparable by this Commission, it would be appropriate to adjust their salary to a 40-hour work week as provided.

³⁰ Skagit's formula is designed to never reduce the county's contribution to the prosecutor's salary.

When analyzing comparability, it is probably a mistake for the Salary Commission to only consider the “mean” salary, also known as the “average” because it is a poor stand-alone statistic. Even the most simplistic analysis of comparing a list of numbers should consider the “mean,” “median” and “mode” because this method provides a better picture.³¹ Today, the prosecutor’s mean salary for all designated comparable counties is \$196,678.24 annually or \$16,389.85 monthly, which makes **the Whatcom County Prosecutor currently underpaid by \$2,003.24 less per year or by \$166.97 less per month than the mean of all the comparable counties.** The median comparable salary and the mode comparable salary is the same in this case at \$199,675 per year or \$16,639.58 per month. **Using median and mode, the Whatcom County prosecutor is currently underpaid by \$5,000 less per year or by \$416.66 less per month than that of all the comparable county prosecutor salaries.** Come 7/1/2022, the mean or average prosecutor salary for all comparable counties will be \$200,116.90 annually, and \$16,676.41 monthly and the median and mode prosecutor salary for all comparable counties will be \$203,169 annually, and \$16,930.75 monthly.

The Washington Citizens Commission on Salary for Elected Officials recently voted to raise salaries for all Washington State elected officials for 2022. In doing so, they declared that “[a]mong the Commissioners who voted for an increase in the second year, there was a consensus that elected official’s salaries within our state have not, and still have not kept pace with Social Security cost of living increase or inflation. Additionally, the state revenue forecast and budget showed optimism in 2022. This is a 1.75% increase in 2022.”³² The increase for the Superior Court judges will take effect on 7/1/2022.

REQUEST

In order to align the Whatcom County Prosecutor’s salary with law and with comparable counties, I respectfully ask that the Whatcom County Salary Commission return to matching the Whatcom County Prosecutor’s salary to the Washington State Superior Court Judicial salaries. The Whatcom County Prosecutor’s salary should match the Washington State Superior Court Judges current salary of \$199,675. Further, on 7/1/2022 and the Whatcom County Prosecutor’s salary should be raised to \$203,169 to match the set increase for the Washington State Superior Court Judges. Returning the Whatcom County Prosecutor salary to its historical, legally appropriate and even comparable-based practice of matching the position’s salary to the Superior Court Judicial salaries is appropriate using all analysis. I thank you for your time to read my letter and for your consideration in this matter.

Sincerely,

Eric J. Richey
Whatcom County Prosecutor

³¹ The "mean" is the "average" where one adds up all the numbers and then divides by the number of numbers. The "median" is the "middle" or "midpoint" value in the list of numbers. The "mode" is the value that occurs most often.

³² Washington Citizens Commission for Salaries for Elected Officials.

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Rebecca M. Xczar
County Assessor

John E. Romaker
Chief Deputy

Comments to the Salary Commission

2/15/2021

Salary Commission,

Thank you for your service on this commission. The Salary Commission plays a vital role for the County and your willingness to participate and contribute are appreciated.

The duties of an elected Assessor are set in statute. The assessor values all property in the county for property tax purposes, updates and maintains records of ownership, maintains tax maps of all property in the county, and calculates levies for taxing districts. Property tax accounts for approx. 30% of the total state and local taxes. It is the primary revenue source for public schools, fire protection, libraries, and parks. State law requires assessors to appraise property at 100% of market value, revalue every property annually, physically inspect one sixth of the county per year, add all new construction annually, and correctly calculate personal property listings. Accuracy, uniformity, and correct reporting are vital to the public and all taxing districts which includes the County. The Assessor is an elected position to maintain a separation of power. The Assessor answers to the people, the taxing districts, and the Department of Revenue. The Assessor must learn and maintain working knowledge of an extensive number of RCW's, WAC's, Dept of Revenue advisories and guidelines, and keep track of pending legislation annually that may impact property value, property tax, taxing districts, or administration of the office.

The Assessor is also a Department Head. Fully staffed, I manage an office of 30 people. I have the same requirements of me as other department heads, with the exception that the sole responsibility rests with me. I answer to the public.

This is my first term in office, and I did not work for the County previously. I am a Certified Residential Real Estate Appraiser, with nearly 18 years' experience appraising property in Whatcom County. I previously served on the Ferndale City Council in addition to running my own appraisal business, with prior years served on the Ferndale Planning Commission and other city boards and commissions. The 2019 Salary Commission had met and completed their work prior to my filing to run for office in 2019,

however I had already publicly announced my intention to run for office. I was encouraged at the prior commission's attempt to bring the salaries closer to reasonable at that time. There were years as a private appraiser that my income was higher than I currently make as the Assessor. I am aware that the public sector is often paid less than the private sector, however there is an expectation of reasonable pay to attract good candidates to run for office. I was surprised however to learn that the elected offices of the Assessor, Treasurer, and Auditor, with all the duties of a Department Head, are paid less than all other department heads at the county. The compression gap between the deputies and the elected officials is also significantly less than the gap between the other department heads and their second in command. This internal parity is unbalanced.

This commission and prior commissions have used "comparable" counties' data. There are some inherent issues with these comparisons. First, the salaries of elected officials in other counties are not necessarily a comparison of "market" salaries. It is a comparison of salary commissions in other counties' decisions and county commissioner's opinions on the elected offices within their county. I contacted some of the other assessors being used in comparison, and they do not feel their salary is at market. They have not received the same cost of living increases that other staff has received, and that they are not treated equally internally within their county.

Secondly, the counties chosen include several that are significantly smaller and/or have much lower cost of living than Whatcom County. The data appears to attempt three superior and three inferior counties; however, Yakima County is being used as a superior county. Yakima is superior in population alone. It is inferior to Whatcom in number of registered voters, number of real property accounts, assessed value, and cost of living; these are the data points that matter to the positions and true comparison. Yakima should be included as an inferior county to Whatcom, not a superior county. This would lead to the inclusion of Clark County and the exclusion of Cowlitz, to have three "superior" and three "inferior". Based on number of real parcels, Lewis, Grays Harbor, and Grant counties each have more parcels than Cowlitz; Cowlitz is an inappropriate county to use as a comparable to Whatcom. Thurston and Kitsap counties should be given the most weight in a comparison, however Kitsap appears to be the only county with fair compensation, which includes a 15% gap between the elected and the deputy position.

The information provided by HR to the commission only has 2020 data, which is not a current representation. I have attempted to find the 2021 salary data and have included it with an adjusted chart of the "comparable" counties. Please see my adjusted comparison spreadsheet exhibit.

I believe the elected Assessor, along with the Auditor and Treasurer, should be paid equal to other department heads within the county. The Administrative Services department heads which are HR, IT, and Finance, are the lowest paid of all department heads, and are paid \$133,332 at step 13. To achieve this internal parity, a 5.59% increase is needed. A 2.5% COLA adjustment should also be considered for 2022 and 2023. This would result in salaries of 2022: \$136,665, and 2023: \$140,082.

Thank you again for you work on the salary commission. I appreciate the opportunity to provide input.

Rebecca Xczar

Whatcom County Assessor