



Comments on Washington Regional Haze State Implementation Plan Colin Deverell, National Parks Conservation Association

Good afternoon and thank you for the opportunity to speak about Washington's Regional Haze State Implementation Plan. My name is Colin Deverell, and I am a Washington resident and third-generation Pacific Northwesterner instilled with a deep love of our incredible outdoor resources. Today, I represent the National Parks Conservation Association (NPCA), which is a national, nonpartisan nonprofit organization with 1.6 million members and supporters across the country and over 42,000 here in Washington. We speak up for all national parks, including our treasured Mt. Rainier, North Cascades, and Olympic, which together support nearly 4,000 jobs and generate \$360 million in visitor spending.

I'm here to express our concerns that the State of Washington's Department of Ecology has proposed a regional haze plan that does not require enough pollution reductions to make reasonable progress toward clean air goals for our parks and to support healthy air for directly affected communities close to haze-polluting facilities. In addition to protecting people, haze reductions are necessary under our nation's clean air laws to benefit Washington's natural and recreational gems that include our three national parks as well as the Class I areas of Alpine Lakes, Glacier Peak, Goat Rocks, Mount Adams, and Pasayten Wilderness.

NPCA was initially pleased with Washington's State Implementation Plan (SIP) source selection process. And we are encouraged that some minimal pollution reductions will be required at the Cardinal Glass and Ash Grove facilities, but Ecology must take the next step of resolving the technical issues and integrating enforceable permit limits into the final rule for these sources.

Beyond this, and of major concern to NPCA, Washington's SIP falls short of the pollution cuts needed to reduce regional haze. As drafted, the plan ignores significant emission reductions that must be required from petroleum refineries and pulp and paper mills. Ecology has improperly concluded that no new pollution reductions are warranted for these sectors during this planning period despite the nearly 5,000 tons of haze pollution that could be reduced from 13 overlooked facilities. With this proposed plan, Ecology will allow major paper mills such as McKinley Paper, WestRock Tacoma, Nippon Dynawave Packaging in Longview, and Port Townsend Paper, among others, as well as numerous oil refineries like BP Cherry Point, Shell in Anacortes, the Marathon facilities in Anacortes and Ferndale to continue to emit thousands of tons of controllable pollution, ignoring opportunities for cost-effective haze controls.

The intent of the regional haze program is for the state to require measures that will result in emission reductions through a four-factor analysis. Washington's approach does not satisfy this intent and ignores the expectations EPA articulated in July of what states need to do to satisfy obligations of the regional haze program. Because Washington's plan does not meet these expectations, it is at risk of being rejected by the agency.

Lastly, NPCA has repeatedly asked that Ecology analyze Ardagh Glass due to its visibility-impairing pollution and harmful effects on air quality in the Seattle neighborhood of Duwamish Valley. Ecology has not done an adequate job at thoroughly assessing environmental justice overlays with the haze planning as EPA has recommended. Residents of this neighborhood have disproportionately shouldered the burden of industry pollution for too long – cleaning up the

Ardagh facility would not only help restore air quality for national parks and public lands but would reduce air pollution harming people of color and low-income families.

Every visitor to our prized Washington national parks and wilderness area deserves to experience clean air and clear views. We expect Ecology to lead the nation with its plan to safeguard our public lands and better our air. We urge you to revise this regional haze plan, requiring reductions from refineries and pulp and paper, sharpening reduction requirements at Ash Grove and Cardinal and addressing emissions from Ardagh Glass to ensure our state's haze plan meets the moment.

Thank you.