

Port of Quincy

Port of Quincy Comments on the Rulemaking Proposal for Air Quality in Overburdened Communities

Washington State Department of Ecology
Attn: Anthony Bruma, Environmental Planner

Dear Mr. Bruma,

The Port of Quincy appreciates the opportunity to provide feedback on the ongoing rulemaking process outlined in the Rulemaking for Air Quality in Overburdened Communities initiative. As a key stakeholder in Washington State's and the Quincy/George area economic and infrastructure development, we are committed to ensuring that environmental regulations are both effective and equitable. As such, we have the following questions and comments about this rulemaking process as it stands at this point in the process.

Community Engagement and Impact Assessment

1. How were the 16 overburdened communities identified, and what criteria were used to determine their inclusion in this initiative?
2. What measures are in place to ensure balanced representation and meaningful engagement of industrial stakeholders, such as Ports, in the decision-making process?
3. What data or public input informed the selection of areas requiring expanded air monitoring?
4. How will Ecology ensure that the new rules do not disproportionately burden rural communities like George while prioritizing emission reductions?

Air Monitoring and Data Transparency

5. The proposal includes a \$10 million investment in high-resolution air monitoring—what specific technologies will be deployed, and how will the data be validated?
6. How will the public and regulated entities access real-time air quality data from expanded monitoring sites, and what assurances are in place that such data will be reliable?
7. What methodology will be used to differentiate between locally generated emissions and those transported from external sources (e.g., wildfires or neighboring states)?
8. Can Ecology provide historical trend analyses demonstrating improvement or degradation of air quality in overburdened communities prior to this rulemaking effort?

Regulatory Standards and Emission Reduction Strategies

9. The presentation suggests adopting "stricter air quality standards" or "alternative mitigation actions." How will these measures be assessed for economic feasibility and effectiveness?
10. What specific emission sources are under consideration for new limitations, and will proposed reductions be proportionally distributed across sectors?
11. What enforcement mechanisms will be used to ensure compliance, and how will Ecology account for unintended consequences, such as economic or operational disruptions in affected industries?
12. Given the variability in industrial processes, will certain sectors be prioritized for emission reductions, or is Ecology proposing blanket standards?

Funding and Implementation Challenges

13. The proposed \$10 million community grant program aims to assist in pollution reduction—what types of projects were funded in Washington State and in what specific communities were they funded, as it does not appear the George area received any grant funding.
14. If new requirements result in increased operational costs for businesses within designated communities, will state or federal subsidies be available to offset these expenses?
15. What cost-benefit analysis has been conducted to compare the proposed rule's environmental benefits with potential economic impacts?

Future Rule Development and Stakeholder Collaboration

16. How will Ecology ensure iterative feedback from affected parties throughout the rulemaking process beyond the initial workshops?
17. What considerations have been made regarding coordination with federal agencies, particularly the Environmental Protection Agency (EPA), to align standards and avoid conflicting regulations?
18. Will Ecology provide case studies or projected outcomes demonstrating how the proposed measures have worked in comparable jurisdictions?

Concerns About Grant Awards and Community Inclusion

We also seek clarification as to why no entity in the George area was awarded funding from the Air Quality in Overburdened Communities Grant Program. Given that the George area was explicitly identified as an overburdened community impacted by criteria air pollution, it is very concerning that no local organization, municipality, or stakeholder in the George area was selected to receive support for emission reduction projects. What factors led to this outcome, and what steps are being taken to ensure that George area organizations have equitable access to resources and grant funding in future cycles? Additionally, can Ecology provide insights as to how it communicated the grant process to applicable stakeholders in the George area?

The Port of Quincy supports policies that promote environmental stewardship while ensuring sustainable economic growth and infrastructure development. We look forward to continued engagement and clarification on these critical concerns. Thank you for your time and consideration.