

January 29, 2026

To: **Department of Ecology**

From: **Port of Royal Slope**

Re: **Port of Royal Slope Comments Regarding Preliminary Draft Rule Language
Chapter 173-448 WAC- Air Quality in Overburdened Communities**

Dear Department of Ecology,

On behalf of the Port of Royal Slope, we appreciate the opportunity to provide comments on the preliminary draft rule language for Chapter 173-448 WAC, Air Quality in Overburdened Communities Highly Impacted by Air Pollution. While we support the intent of improving air quality and protecting public health, we have serious concerns about how this rule may be applied to the George and West Grant County Area.

1. George and West Grant County is not an industrial area

- George and West Grant County does not have any large-scale industrial complexes, manufacturing plants, or refineries that would qualify as “high priority emitters” as outlined in WAC 173-448-070. The area is primarily agriculture and tourism oriented, with small businesses and family farms.

2. Pollution Sources are primarily external and beyond local control including

- **Wildfire Smoke** originating from fires outside of George and West Grant County.
- **Seasonal inversions and meteorological conditions** that trap pollutants from outside George and West Grant County.
- **Traffic** on Interstate 90 at George and State Route 26 in West Grant County contributes to vehicle emissions from external transportation.
- **Dust and particulate matter** from wind and the surrounding arid lands.

3. Concerns about rule application

- In Publication 23-02-018- Response to Comments Section 3, page 12, it states “*Establish that this identification will not be removed unless and until air quality targets are met*”. This would be an impossible task for the George and West Grant County area as the primary sources of pollutants are outside of their control as stated above.
- In Publication 23-02-017, Community Summary Report, page 31, “*While the community is meeting the national ambient air quality standards for criteria air pollution, it likely experiences high levels of PM_{2.5}, when compared to the rest of Washington State*” While this is possible, using a local and a longer monitoring period providing more data to make solid determination on the source of pollution seems reasonable. Local monitoring was put in place August of 2023. Publication 23-02-115 is dated December 2023. I see an updated Publication 25-02-037 dated December 2025. The information for 2024 shows a stark difference when compared to the limited data from 2023. It seems a longer period of monitoring will be beneficial.

- The draft rule seems to assume local permitted industrial sources are the primary contributors to poor air quality of the identified communities. This is not the case in George and West Grant County. Therefore, enforcing such emission requirements or compliance on a source that does not exist in George and West Grant County would be ineffective.
- Such requirements would inadvertently penalize small businesses, farms and the residents for regional wildfires, seasonal inversions, wind, and vehicle emissions on local highways, all of which George and West Grant County have no control over.

4. Request for clarification and adjustment

We respectfully request the Department of Ecology:

- Clarify that communities like George and West Grant County, which lack significant industrial sources, will not be subject to emission reduction requirements under this rule.
- Recognize the distinction between locally generated emissions the community can control and external pollution sources George and West Grant County cannot control
- Focus regulatory strategies on actual sources of emissions a community can control communities that are receivers of pollution
- Consider each community and their unique landscape. For example, George and West Grant County have an arid climate with periodic winds, dust is inevitable.
- Ensure that the identification of “high priority emitters” is based on actual local emissions data, not generalized data collected from other geographic areas.
- Publication 23-02-017 Dated March 2023 lists a population of **1,500** for George and West Grant County compared to Publication 23-02-115 Dated December 2023 which lists the population as **2,206** for George and West Grant County. This variation in numbers shows a 68% increase in population in 9 months’ time. Publication 25-02-037 dated December 2025 states the population of **3,392** more than doubling the population in two years in this very rural area.
- Ensure that this ruling will not negatively impact future economic/industrial growth in George and West Grant County.

Seeing the diversity in communities, it doesn’t seem a single approach will be effective to reduce pollution in all 16 identified communities. Each community has unique features that may or may not be contributing to their pollution. Some Communities like George and West Grant County primarily receive pollution from sources outside of their control. There should be great care taken not to burden these identified communities with regulations for pollution they have no control over.

The Port of Royal Slope is asking the Department of Ecology to collect additional monitoring data specific to each identified community, to verify existing data is accurate and sufficient to come to reasonable conclusions on the best way to reduce the specific pollution in each community while writing this ruling.

Thank you for considering our comments.

Sincerely,



Bonnie Valentine
Executive Director