

February 12, 2026

RE: Chapter 173-448 WAC, Air Quality in Overburdened Communities Highly Impacted by Air Pollution Rulemaking Public Comment

Thank you for the opportunity to comment on the preliminary draft rule language for Chapter 173-448 WAC, *Air Quality in Overburdened Communities*. Kaiser Aluminum shares Ecology's goal of improving air quality and human health in overburdened communities. Kaiser is privileged to employ about one thousand union workers in Spokane Valley and takes pride in partnering with stakeholders throughout the region to address community concerns.

The Climate Commitment Act introduced an air monitoring program to identify communities that are highly impacted by criteria air pollution. As part of that effort, the Washington State Department of Ecology identified an area of Spokane and Spokane Valley, largely adjacent and parallel to the Spokane River and Interstate 90, as an overburdened community. The area is in attainment with national ambient air quality standards, but particulate matter (PM2.5) remains high, largely due to sources such as wildfires, mobile transportation sources (including cars, trucks, and trains), residential wood burning, and dust from agricultural and construction activities. The area is also home to active industrial facilities, including Kaiser's Trentwood Works, that operate pursuant to air permits managed by the Spokane Regional Clean Air Agency.

Although Ecology proposes in the draft rule to determine the "greatest contributors" to criteria air pollution within a designated overburdened community, the draft rule directly regulates only one potential source category—permitted and registered point sources determined to be "high priority significant emitters." Under the proposed rule, only "high priority significant emitters" would be subject to the requirements to develop and implement emissions monitoring plans and emissions reduction plans. Only "high priority significant emitters" would be subject to enforcement actions or stricter emissions limits.

The draft rule's limited focus on permitted and registered sources will be ineffective at reducing particulate matter impacts in the Spokane and Spokane Valley region. Like many areas of the state, the region is significantly impacted by seasonal wildfire smoke, transportation emissions from interstate traffic, and dust from surrounding agricultural areas. The draft rule does not address these significant sources of particulate matter

and, instead, only targets sources that are already monitoring and controlling emissions under enforceable permits.

Kaiser supports Ecology's efforts to identify and alleviate air quality impacts to our community. However, we respectfully request that Ecology consider regulatory strategies to address the impact of non-permitted sources that are significantly contributing to air quality concerns. Focusing solely on permitted industrial facilities will not achieve the Climate Commitment Act's goal of improving air quality in overburdened communities.