



November 26, 2025

To: Department of Ecology

From: Port of Quincy

Re: Port of Quincy 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 Quincy, 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 significant concerns about how this rule may be applied to the George, WA area.

1. George is not an industrial area

The George, WA community does not host industrial facilities that emit criteria pollutants at levels contemplated in the draft rule.

- The local economy is primarily agricultural, food processing, and service-oriented.
- There are no large-scale refineries, manufacturing plants, or industrial complexes in George that would qualify as “high priority emitters” under the thresholds outlined in WAC 173-448-070.

2. Pollution sources are external and beyond local control

The majority of air quality impacts in George come from external sources, including:

- **Wildfire smoke** transported into the Columbia Basin from regional and statewide fires.
- **Dust and particulate matter carried from surrounding arid lands.**
- **Seasonal inversions and meteorological conditions** that trap pollutants from distant sources in the Columbia Basin.
- **Traffic along Interstate 90**, a major east–west corridor that passes through George, contributes vehicle emissions and transport-related air pollutants from external sources.

These above sources are not under the control of George residents, businesses, or the Port of Quincy. Imposing regulatory obligations on the George community for pollution that is not generated from George creates an inequitable burden and misdirects resources away from the true sources of emissions.

3. Concerns about rule application

The draft rule appears to assume that local industrial sources are the primary contributors to poor air quality in identified communities. This assumption does not reflect the reality in George.

- Applying emission reduction requirements or compliance obligations to our community would be ineffective, as there are no local industrial sources to regulate.
- Such requirements could inadvertently penalize small businesses, farms, and residents who have no ability to control wildfire smoke, regional dust, or meteorological conditions.

4. Request for clarification and adjustment

We respectfully request that Ecology:

- Clarify that communities like George, which lack significant industrial sources, will not be subject to emission reduction obligations under this rule.
- Recognize the distinction between locally generated emissions and external regional pollution sources.
- Focus regulatory strategies on the actual sources of emissions rather than imposing rules on communities that are receivers of pollution but not contributors.
- Ensure that the identification of “high priority emitters” is based on actual local emissions data, not generalized assumptions about overburdened communities.

Conclusion

The Port of Quincy supports reasonable solutions to improve air quality across Washington State. However, we urge Ecology to avoid imposing rules on communities like George where residents and businesses have no control over the external pollution sources that drive local air quality conditions. We ask that Ecology revise the draft rule language to ensure fairness, accuracy, and effectiveness in addressing air quality challenges.

Thank you for your consideration of our comments.

Sincerely,

PORT OF QUINCY


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