

Date: January 16, 2026

To: Washington State Department of Ecology

Re: Comments on Draft Rule Language for Chapter 173-448 WAC – Improving Air Quality in Overburdened Communities

Dear Department of Ecology,

On behalf of the Port of Walla Walla, thank you for the opportunity to comment on the draft rule language for Chapter 173-448 WAC, *Improving Air Quality in Overburdened Communities*, pursuant to RCW 70A.65.020. While the objective of improving air quality and protecting public health is understood, the Port has concerns regarding the practical application of this rule in Western Walla Walla County, including the potential impacts on existing businesses and future economic development in the Wallula/Burbank area.

The Port of Walla Walla serves as the economic development agency for Walla Walla County, a rural region that supports a range of industrial, agricultural, manufacturing, and logistics-related businesses. These employers provide critical family-wage jobs in an area with limited alternative employment opportunities and a workforce that includes a high percentage of minority and low-income residents. Regulatory approaches that increase compliance costs or create regulatory uncertainty for these businesses risk negatively affecting job retention, private investment, and future development in the region.

While the draft rule focuses on emissions from permitted and registered sources, air quality conditions in Western Walla Walla County are influenced by multiple factors beyond local control. These include regional wildfire smoke, long-range transport of particulate matter within the Columbia Basin, agricultural dust, and emissions from state and interstate transportation corridors that serve statewide and interstate commerce. Emission reduction strategies that do not clearly distinguish between local sources and external contributors may misdirect resources and yield limited air quality benefits.

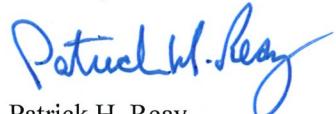
The Port is particularly concerned that broad application of the proposed framework could unintentionally constrain future industrial development in the county. Industrial land availability is limited in southeastern Washington, and the Port's properties are among the few sites capable of supporting large-scale manufacturing and employment uses. Uncertainty regarding future regulatory obligations or potential designation under this rule could discourage investment in projects that are otherwise consistent with adopted land use plans and state economic development goals.

As Ecology finalizes this rulemaking, the Port respectfully requests that the Department:

- Ensure that implementation does not disproportionately impact existing, compliant businesses that provide family-wage employment in rural communities.
- Clearly distinguish between locally generated emissions and pollution originating from regional or external sources when identifying emission reduction priorities.
- Clarify the methodology, purpose, and regulatory implications of identifying “high priority emitters,” particularly as it relates to future permitting or compliance requirements.
- Coordinate emission reduction strategies with available funding and incentive programs to support practical, measurable improvements without limiting economic opportunity.
- Align implementation of this rule with existing EPA guidelines and methodologies and avoid creating new standards.

Thank you for considering these comments. The Port of Walla Walla appreciates the opportunity to provide input and looks forward to continued coordination as Ecology advances this rulemaking.

Sincerely,



Patrick H. Reay
Executive Director
Port of Walla Walla