Bascomb Grecian

Subject: Comment on Preliminary Draft of Chapter 173-448 WAC – Air Quality in Overburdened Communities

To Whom It May Concern:

Thank you for the opportunity to provide comments on the preliminary draft language for Chapter 173-448 WAC. After reviewing the intent and structure of this proposed rule, it is clear the framework overstates the existence of any problem it seeks to address.

The draft repeatedly refers to "overburdened communities highly impacted by air pollution." The fundamental question is: what overburdened communities? Washington does not have regions suffering from the level of criteria air pollution this rule presumes. State and federal monitoring consistently show Washington is meeting, and often exceeding, established air quality standards. The premise behind this rule is unsupported by current conditions.

Creating new regulatory layers for a problem that is not evident on the ground invites the same economic consequences already playing out in California. Expansive environmental rulemaking—untethered from actual air quality data—has contributed to significant economic strain, regulatory gridlock, and a loss of business competitiveness in that state. Washington should not repeat a model that has clearly failed to produce economic or environmental stability.

Climate change is not a settled science. The earth is in a carbon deficit. Many agencies define a "vulnerable" community before examining whether air quality exceeds federal standards.

The narrative is created first; the justification is built second.

Climate policy has become an economic policy in disguise, changing social policy.

The most aggressive climate rules do not meaningfully alter global emissions, but they:
• raise energy costs
• restrict infrastructure
• push investment out of state
• create compliance industries with no productivity value

California is the clearest example—high regulation, no measurable climate impact, and significant economic failure.

Modern climate rules rarely account for:
• orbital cycles
• solar variability
• long-term ocean cycles (PDO, AMO)

These natural systems have driven warming and cooling long before industrial emissions existed.

Downplaying them produces distorted cause-and-effect narratives.

Milankovitch Cycles

Milutin Milankovitch demonstrated that long-term climate shifts are driven by predictable changes in Earth's orbit and orientation relative to the sun. These cycles operate over tens of thousands to hundreds of thousands of years and directly affect how much solar energy reaches different parts of the planet.

There are three main components:

1. Eccentricity (Shape of Earth's Orbit) — ~100,000-year cycle

Earth's orbit oscillates between more circular and more elliptical.
This changes the total solar energy the planet receives.

2. Axial Tilt (Obliquity) — ~41,000-year cycle

Earth's tilt varies between about 22.1° and 24.5°.
This adjusts seasonal intensity—more tilt means more extreme seasons, less tilt means milder seasons.

3. Precession (Wobble of Earth's Axis) — ~26,000-year cycle

Earth slowly wobbles like a spinning top.
This alters where seasons occur during Earth's orbit, changing the contrast between hemispheres.

Washington already operates a robust, disciplined, and effective air quality program. Adding another chapter of regulation under the banner of addressing "overburdened communities" creates bureaucracy without delivering measurable benefit. It diverts resources toward a narrative rather than toward demonstrated needs, and it expands agency authority at the expense of practical outcomes.

I recommend Ecology discontinue this rulemaking effort and instead continue strengthening existing, data-driven programs already proving successful. Regulation must be tied to real conditions—not assumptions—and Washington should avoid replicating frameworks that have produced economic harm elsewhere.

Thank you for considering this perspective.

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