

# Washington Conservation Action (Sonia Hitchcock)



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*Protecting People & Nature as One*

May 15, 2026

Linda Kildahl  
Washington State Department of Ecology  
Air Quality Program  
PO Box 47600  
Olympia, WA 98504-7600

**Re: Comments on the Proposed Amendments to Chapters 173-476 and 173-400 WAC**

Dear Linda Kildahl:

Washington Conservation Action (WCA) appreciates the opportunity to provide comments on the proposed changes to the Ambient Air Quality Standards and General Regulations for Air Pollution Sources through Chapters 173-476 and 173-400 WAC.

WCA, formerly known as Washington Environmental Council, has been a leading policy voice for the environment in our state for nearly 60 years. We develop, advocate, and defend policies that advance environmental progress and justice, and we recently submitted a comment letter for the open rulemaking on Chapter 173-448 WAC – Air Quality in Overburdened Communities.

The proposed updates to Chapter 173-476 and 173-400 WAC will help ensure that Washington residents are protected from the impacts of fine particulate matter (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide, and ozone, based on the best available science as determined by the Clean Air Scientific Advisory Committee of the federal Environmental Protection Agency in 2024.

Updating the standards for PM<sub>2.5</sub> and sulfur dioxide to align with the revised National Ambient Air Quality Standards (NAAQS) will protect public health across Washington communities. Revising the annual PM<sub>2.5</sub> from 12 µg/m<sup>3</sup> to 9 µg/m<sup>3</sup>, as well as removing outdated SO<sub>2</sub> standards and adding the new annual standard of 10 parts per billion, reduces exposure to these harmful pollutants. This change will directly benefit groups including children, outdoor workers, unhoused people, elderly people, and people with preexisting health conditions who are especially susceptible to the impacts of air pollution. Less PM<sub>2.5</sub> and SO<sub>2</sub> pollution means fewer hospital visits each year, and fewer community members put at risk for asthma, other devastating ailments, and premature death.

Additionally, updating the general regulations for air pollution sources strengthens guidelines for permitting authorities and enables greater discretion when identifying



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potential standard violations during project review periods. By proactively identifying significant impact levels and establishing a pathway for consistently requiring cumulative impact analyses, new and modified pollution sources will be addressed more promptly and thoroughly. These updates ensure WAC 173-400 aligns with its purpose, to control and prevent air quality contaminant emissions.

These benefits are why the Environmental Protection Agency strengthened the NAAQS in 2024, and highlight the importance of this opportunity for Ecology to protect Washington's air quality through ensuring timely updates to the Ambient Air Quality Standards and Significant Impact Levels in alignment with the most up-to-date science. We support the Department of Ecology's prioritization of protecting the health and safety of Washingtonians, especially those who bear the greatest burdens of air pollution.

Sincerely,  
Sonia Hitchcock  
Climate and Clean Air Manager  
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