

Comments on Draft General Order of Approval No. 26AQ-GO-01 Stationary and Portable Rock Crushers

Introduction

North Central Construction, Inc. appreciates the opportunity to comment on the Washington State Department of Ecology's proposed revisions to the General Order of Approval for Stationary and Portable Rock Crushers.

Our company owns and operates portable rock crushing and aggregate processing equipment throughout Washington State, supplying aggregate materials used in highways, bridges, airports, utility infrastructure, residential and commercial development, ready-mix concrete, hot mix asphalt, and numerous public works projects. Because our operations support projects across a wide variety of geographic locations and regulatory jurisdictions, we have extensive experience balancing environmental compliance with the practical realities of aggregate production and portable crushing operations.

We recognize the important role General Orders play within Washington's air permitting program. General Orders provide an efficient, predictable, and technically supported permitting pathway for facilities whose emissions and operating characteristics have been evaluated in advance. This framework benefits both regulators and permit holders by reducing unnecessary administrative burdens while maintaining appropriate environmental protections.

Our comments are not intended to oppose environmental protection or the modernization of General Order requirements. Rather, they are intended to ensure the final General Order is technically supported, practically implementable, and reflective of the operational realities of Washington's aggregate industry.

After reviewing the proposed General Order, Technical Support Document, and associated SEPA documentation, we believe several significant revisions warrant additional explanation and evaluation before the proposal is finalized.

In particular, we are concerned that the proposal introduces new production limitations, revised eligibility requirements, expanded administrative obligations, and increased reliance on individual Notice of Construction permits without fully explaining the technical analyses supporting those revisions or evaluating their practical impacts on aggregate production, portable crushing operations, public infrastructure delivery, and construction material availability throughout Washington State.

Throughout the proposal, Ecology frequently relies upon representative assumptions while acknowledging that future facility locations, production demands, surrounding land uses, and site-specific operating conditions are unknown. Nevertheless, the proposal establishes

statewide production limitations and permitting criteria intended to apply across a diverse range of facilities operating under widely varying conditions.

We respectfully request Ecology provide additional technical justification, implementation guidance, and impact analyses supporting these revisions so stakeholders can fully understand both the environmental benefits and the practical consequences associated with the proposed General Order.

The following comments identify several areas where additional clarification, technical support, or evaluation would improve the proposal while preserving the intended purpose of the General Order program as an efficient, predictable, and practical permitting pathway for qualifying facilities.

1. Purpose of the General Order Program

The General Order program has historically provided an efficient, predictable, and technically supported permitting pathway for facilities with similar operational characteristics and emissions profiles. By establishing standardized permitting criteria for qualifying facilities, General Orders reduce unnecessary administrative burdens while maintaining appropriate environmental protections and allowing both permit holders and regulators to operate within a consistent and predictable regulatory framework.

We recognize Ecology's responsibility to periodically review and update General Orders to reflect evolving scientific information, regulatory requirements, and environmental objectives. We support those efforts when they are supported by sound science, transparent decision-making, and practical implementation.

However, as General Order eligibility becomes increasingly restrictive through revised production limitations, setback requirements, permitting criteria, and operational standards, we respectfully request Ecology explain how these revisions continue to support the original purpose of the General Order program.

Specifically, we respectfully request Ecology provide additional information regarding:

- Whether Ecology evaluated how many existing or future facilities are expected to remain eligible under the revised General Order;
- Whether Ecology evaluated the cumulative increase in individual Notice of Construction (NOC) applications that may result from reduced General Order eligibility;
- Whether Ecology evaluated the impacts of increased individual permitting on agency workload, permit review timelines, and project delivery;

- Whether alternative approaches were considered that would preserve General Order eligibility while continuing to achieve applicable air quality objectives; and
- How Ecology determined that the proposed revisions continue to fulfill the General Order program's intended purpose as an efficient, predictable, and practical permitting pathway.

Providing this additional information would assist stakeholders in understanding not only the environmental objectives of the proposed revisions, but also how Ecology envisions the future role of the General Order program within Washington's air permitting framework.

2. Proposed Production Limits

The proposed General Order establishes revised annual production limits for facilities operating under General Order coverage.

We recognize Ecology's responsibility to establish production thresholds that are consistent with applicable air quality requirements. However, the proposal provides comparatively little explanation regarding the technical basis used to establish the proposed production limits or how those limits reflect the operational realities of aggregate production throughout Washington State.

Unlike many manufacturing industries, aggregate production is not driven by steady consumer demand or continuous manufacturing schedules. Production is driven by construction activity, public infrastructure investments, emergency repairs, weather conditions, seasonal work windows, and the availability of projects requiring aggregate materials.

Demand for aggregate materials is largely determined by the needs of Washington's transportation system, utility infrastructure, residential construction, commercial development, and public works programs. Consequently, reductions in production at one facility do not necessarily reduce overall demand for aggregate materials. Rather, production may simply shift to other facilities, potentially increasing hauling distances, transportation costs, fuel consumption, truck traffic, and associated emissions.

Accordingly, we respectfully request Ecology provide additional information regarding:

- The technical basis supporting the proposed annual production limits;
- The emissions modeling and assumptions used to establish those limits;
- Whether actual production data from Washington aggregate operations was evaluated during development of the proposal;

- Whether Ecology evaluated seasonal production patterns common throughout Washington's construction industry;
- Whether Ecology evaluated the impacts of weather delays, emergency infrastructure repairs, equipment failures, or accelerated construction schedules;
- Whether Ecology evaluated the potential for production to shift to other facilities rather than decrease overall;
- Whether Ecology evaluated the potential effects of increased haul distances on fuel consumption, transportation costs, truck traffic, and associated emissions; and
- Whether alternative production thresholds were evaluated that would continue to achieve applicable air quality objectives while preserving operational flexibility.

Aggregate production frequently occurs in concentrated periods dictated by construction schedules rather than evenly throughout the calendar year. The ability to increase production during favorable operating conditions is often essential to maintaining project schedules, supplying construction materials, and meeting the demands of public infrastructure throughout Washington State.

Providing additional information regarding the technical basis supporting the proposed production limits would allow stakeholders to better understand how Ecology evaluated both the intended environmental benefits and the broader operational impacts associated with these revisions.

3. Ecology's Stated Production Reduction Objectives

The accompanying SEPA documentation indicates that the proposed General Order is expected to reduce annual rock production within individual pits and reduce truck traffic associated with those operations. These statements suggest that reduced production and associated transportation activity are anticipated outcomes of the proposed revisions.

We recognize Ecology's responsibility to evaluate the environmental impacts associated with aggregate production and transportation. However, because aggregate materials are essential to virtually every public and private construction project throughout Washington State, we respectfully request additional information regarding the analyses supporting these conclusions and the broader impacts they may have on Washington's construction materials supply chain.

Demand for aggregate materials is largely driven by transportation infrastructure, residential and commercial development, utility construction, public works projects, and emergency repairs. These projects will continue to require aggregate regardless of where that material is produced.

Accordingly, we respectfully request Ecology provide additional information regarding:

- The technical analyses supporting the conclusion that reduced production at individual pits will reduce overall environmental impacts;
- Whether Ecology evaluated the potential for production to shift to other aggregate operations rather than decrease overall statewide production;
- Whether Ecology evaluated the potential for longer hauling distances if production is redistributed among fewer qualifying facilities;
- Whether Ecology evaluated the potential for increased truck traffic on regional transportation corridors if aggregate production is redistributed among fewer qualifying facilities rather than reduced overall;
- Whether increased hauling distances may increase fuel consumption, truck traffic, transportation costs, and associated emissions;
- Whether Ecology evaluated potential impacts on aggregate availability for public infrastructure, emergency response projects, housing development, and commercial construction;
- Whether Ecology evaluated the cumulative economic impacts associated with reduced production flexibility throughout Washington's aggregate industry; and
- Whether alternative regulatory approaches were evaluated that would achieve comparable environmental objectives while minimizing unintended impacts on material availability and infrastructure delivery.

The accompanying SEPA documentation also indicates that the proposal is expected to reduce truck traffic associated with individual pits. We respectfully request Ecology clarify whether this conclusion reflects an anticipated reduction in statewide truck traffic or whether truck trips may instead be redistributed among other aggregate sources if material demand remains unchanged.

Because aggregate is the foundational material used to produce asphalt, concrete, and countless other construction products, revisions affecting aggregate production may also influence multiple downstream industries that depend upon a reliable and predictable supply of construction materials. We respectfully request Ecology identify whether these broader supply chain impacts were evaluated as part of the proposed rulemaking.

Understanding these broader system-wide impacts is important because the environmental benefits associated with reduced production at one location may differ from the overall impacts

experienced across Washington's aggregate supply chain if production is simply transferred to more distant facilities.

Providing additional information regarding these analyses would allow stakeholders to better understand the assumptions supporting the proposed General Order and evaluate whether the anticipated environmental benefits have been considered alongside the practical realities of supplying aggregate materials for Washington's growing infrastructure needs.

4. General Order Eligibility and Setback Requirements

The proposed General Order establishes revised eligibility criteria, including setback requirements, that determine whether a facility may operate under General Order coverage or must instead pursue an individual Notice of Construction (NOC) permit.

We recognize Ecology's responsibility to establish permitting criteria that protect public health and comply with applicable air quality standards. However, these eligibility requirements represent one of the most significant revisions contained within the proposal because they directly determine whether future rock crushing operations qualify for the streamlined General Order permitting process.

General Orders exist to provide an efficient, predictable, and technically supported permitting pathway for facilities with similar operational characteristics and emissions profiles. The value of a General Order lies not only in protecting public health and the environment, but also in providing regulatory certainty for both applicants and the Department.

As proposed, the revised eligibility criteria may substantially reduce the number of future aggregate operations able to utilize that permitting pathway while shifting a greater number of projects toward individual Notice of Construction permitting.

Accordingly, we respectfully request Ecology provide additional information regarding:

- The technical basis supporting the proposed eligibility criteria and setback requirements;
- The pollutant or pollutants that ultimately governed the proposed setback distances;
- The modeling assumptions and technical analyses used to establish those setback requirements;
- Whether alternative setback distances or alternative compliance approaches were evaluated during development of the proposal;
- The number of historical General Order facilities that would not have qualified under the revised eligibility criteria;

- The estimated number of future facilities expected to require individual Notice of Construction permits because of the revised eligibility standards;
- Whether Ecology evaluated the potential impacts of reduced General Order eligibility on the availability of locally sourced aggregate materials for public infrastructure and emergency response projects;
- Whether Ecology evaluated alternative compliance pathways that would allow applicants to demonstrate compliance through site-specific analyses while preserving General Order eligibility where appropriate; and
- Whether Ecology evaluated the cumulative impacts associated with reduced General Order eligibility on aggregate production, portable crushing operations, transportation infrastructure, and public works projects.

The Technical Support Document acknowledges that future facility locations, surrounding land uses, topography, meteorological conditions, and site-specific operating characteristics are unknown when the General Order is developed. Despite this acknowledged variability, the proposal establishes standardized statewide eligibility criteria intended to apply across a diverse range of future aggregate operations.

Rock crushing operations occur in a wide variety of settings, including permanent quarries, temporary construction projects, public infrastructure improvements, reclamation activities, and portable aggregate processing sites. Existing topography, prevailing wind conditions, production rates, natural screening, surrounding land uses, and operational configurations vary considerably among these locations.

Given this variability, we respectfully request Ecology explain how these site-specific factors were evaluated when developing standardized eligibility criteria intended to apply uniformly throughout Washington State.

We further encourage Ecology to preserve a pathway allowing applicants to demonstrate compliance through site-specific air quality analyses where appropriate rather than automatically requiring individual Notice of Construction permitting solely because standardized eligibility criteria cannot be satisfied.

Providing additional information regarding the technical basis supporting these revisions would allow stakeholders to better understand how the proposed eligibility criteria continue to fulfill the intended purpose of the General Order program while maintaining appropriate environmental protections.

5. Practical Implementation of the Individual Notice of Construction (NOC) Permitting Pathway

Throughout the proposed General Order, Technical Support Document, and associated SEPA documentation, Ecology repeatedly identifies an individual Notice of Construction (NOC) permit as the alternative permitting pathway for facilities that cannot satisfy the revised General Order eligibility criteria.

While an individual NOC may be an appropriate permitting option for certain facilities, the proposal provides comparatively little discussion regarding the practical implications of requiring additional aggregate operations to pursue that permitting pathway.

The proposed revisions effectively shift a portion of future rock crushing and aggregate production projects from a streamlined permitting process to an individualized permitting process without fully evaluating or explaining the associated regulatory, financial, and operational impacts.

Specifically, the proposal does not appear to discuss:

- The anticipated consultant costs associated with preparing an individual Notice of Construction application;
- Air dispersion modeling costs;
- Engineering and technical support costs;
- Additional permitting fees;
- Anticipated agency review timelines;
- Whether Ecology evaluated its own staffing capacity and anticipated permit review workload associated with an increase in individual Notice of Construction applications;
- Potential project delays resulting from longer permitting processes; or
- The cumulative economic impacts associated with requiring a greater number of applicants to pursue individual permits.

These considerations are particularly important for portable rock crushing operations supporting highway construction, bridge replacements, airport improvements, utility infrastructure, emergency repairs, quarry development, and other public works projects where project schedules are frequently dictated by weather, contract completion dates, funding cycles, environmental work windows, and seasonal construction demands.

Unlike permanent industrial facilities, portable crushing spreads are routinely mobilized to support specific construction projects and are often integral to maintaining efficient project sequencing. Delays in permitting may therefore affect not only aggregate producers, but also general contractors, public agencies, utility providers, and the communities those projects are intended to serve.

General Orders have historically provided a predictable and efficient permitting pathway for qualifying facilities. If future aggregate operations are expected to transition to individual permitting with greater frequency, stakeholders should understand the practical consequences associated with that transition.

Accordingly, we respectfully request Ecology provide additional information regarding:

- The anticipated permitting timeline for individual Notice of Construction applications submitted by facilities that no longer qualify under the revised General Order;
- Typical consultant, engineering, and modeling costs associated with obtaining an individual permit;
- Whether Ecology evaluated the cumulative economic impacts associated with increased reliance on individual permitting;
- Whether Ecology evaluated the effects that longer permitting timelines may have on public infrastructure delivery, emergency response projects, utility construction, quarry development, and seasonal construction schedules;
- Whether Ecology evaluated the impacts of increased individual permitting on portable rock crushing operations that routinely relocate in response to project demands;
- Whether Ecology evaluated the potential impacts on aggregate availability during emergency response or disaster recovery efforts where rapid mobilization may be necessary; and
- Whether alternative compliance pathways were considered that would preserve General Order eligibility while continuing to achieve applicable air quality objectives.

Providing this information would allow stakeholders to better understand whether the proposed revisions appropriately balance environmental protection with the General Order program's longstanding purpose of providing an efficient, predictable, and practical permitting process for qualifying facilities.

6. Portable Rock Crushing Operations

Portable rock crushing operations play an essential role in Washington's construction materials industry. Unlike permanent processing facilities, portable crushers are specifically designed to relocate in response to changing project demands, allowing aggregate to be produced near the point of use while supporting transportation projects, utility construction, quarry development, emergency response activities, and other public infrastructure improvements throughout the state.

Portable crushing operations routinely support state highways, county roads, municipal infrastructure, airports, bridges, utility installations, commercial developments, residential construction, and emergency repairs. Their ability to relocate allows contractors and public agencies to efficiently utilize locally available aggregate resources while reducing transportation distances and supporting project schedules.

Producing aggregate closer to the point of use may reduce haul distances, decrease fuel consumption, minimize truck traffic over long distances, reduce wear on public roadways, improve construction efficiency, and lower overall transportation-related emissions compared to hauling aggregate from more distant permanent facilities.

The proposed General Order introduces revised eligibility criteria, notification requirements, operational restrictions, and permitting considerations that may substantially affect future portable crushing operations.

While we recognize Ecology's responsibility to maintain appropriate environmental oversight, we respectfully request additional clarification regarding how these requirements are intended to function for portable aggregate operations that routinely relocate throughout Washington.

Specifically, we respectfully request Ecology identify:

- Whether the proposed requirements were evaluated using actual portable rock crushing operations located throughout Washington State;
- Whether Ecology evaluated the cumulative impacts these revisions may have on transportation infrastructure, quarry development, utility construction, emergency response projects, and public works;
- Whether the proposed notification and administrative requirements were evaluated for their potential impacts on project mobilization and construction schedules;
- Whether Ecology evaluated the practical challenges associated with locating portable crushing equipment within active construction projects, temporary processing sites, quarry expansions, reclamation activities, and emergency response locations;

- Whether Ecology evaluated how reduced General Order eligibility may affect the ability to rapidly mobilize portable crushing equipment when needed;
- Whether relocation of an existing portable crusher to another project location will require additional SEPA review under the proposed General Order;
- Whether Ecology evaluated the effects that additional SEPA review timelines may have on emergency infrastructure repairs, disaster recovery efforts, transportation projects, and other time-sensitive construction activities; and
- Whether alternative approaches were considered that would preserve operational flexibility while continuing to achieve the intended environmental objectives.

Portable crushing operations frequently operate under conditions that provide little flexibility for permitting delays. Transportation projects, utility installations, emergency repairs, and seasonal construction activities often require aggregate production to begin within narrow construction windows established by project owners, environmental work periods, weather conditions, and contractual obligations.

The proposal also raises questions regarding the relationship between portable crusher relocations and environmental review requirements. Portable crushers are routinely relocated in response to changing project needs, many of which have already undergone broader environmental review as part of transportation, utility, or construction projects. Additional clarification regarding when SEPA review would be required for portable relocations would improve regulatory certainty while helping to avoid unnecessary project delays.

We also respectfully request Ecology clarify whether existing environmental documentation associated with a project site may satisfy portions of any required review for portable equipment relocations, thereby avoiding unnecessary duplication while maintaining appropriate environmental oversight.

The proposal appears to focus primarily on emissions associated with individual facilities without fully discussing the broader operational role portable crushing plays in efficiently supplying aggregate materials for projects throughout Washington.

Accordingly, we respectfully request Ecology provide additional information regarding how these practical considerations were evaluated during development of the proposed General Order and whether alternative approaches were considered that would maintain environmental protections while preserving the operational flexibility necessary to efficiently deliver aggregate materials to Washington's construction industry.

Providing this additional information would improve regulatory certainty, reduce implementation challenges, and better achieve the shared objective of protecting public health while maintaining the efficient delivery of essential public infrastructure.

7. Administrative Burden and Cumulative Compliance Requirements

The proposed General Order introduces or expands numerous administrative, operational, monitoring, and recordkeeping requirements intended to support compliance with the revised permitting framework. Individually, many of these requirements appear reasonable and are consistent with responsible environmental stewardship and sound operational practices.

However, when considered collectively, these revisions represent a meaningful expansion of the ongoing administrative responsibilities associated with operating stationary and portable rock crushing facilities under the General Order program.

Among other things, the proposal expands or modifies production tracking, operating records, portable equipment notifications, maintenance documentation, water application records, fugitive dust control documentation, compliance demonstrations, complaint reporting, monitoring activities, and other recordkeeping obligations associated with General Order compliance.

While each individual requirement may appear relatively minor when evaluated independently, the cumulative effect of these obligations may result in a significant increase in administrative workload for permit holders, particularly for companies operating multiple facilities or portable crushing spreads that relocate throughout the construction season.

Accordingly, we respectfully request Ecology clarify whether it evaluated the cumulative administrative impacts associated with the proposed revisions, including:

- Additional labor hours required to maintain compliance;
- Increased administrative staffing requirements;
- Additional training necessary for operations personnel;
- Additional compliance responsibilities for companies operating multiple facilities under a single environmental compliance program;
- Increased compliance management responsibilities associated with portable crushing operations that routinely relocate between project sites;
- The cumulative costs associated with expanded recordkeeping, monitoring, reporting, and documentation requirements;

- Whether Ecology evaluated the operational impacts associated with expanded daily water application logs, fugitive dust documentation, and related recordkeeping requirements; and
- Whether less burdensome alternatives were considered that would achieve the same environmental objectives while reducing unnecessary administrative complexity.

We also respectfully request clarification regarding the proposed complaint reporting requirements.

The proposal appears to require notification to Ecology following receipt of complaints while other portions of the General Order reference complaints specifically related to air quality impacts. Additional clarification regarding the scope of this requirement would promote consistent implementation and reduce uncertainty regarding reporting expectations.

Specifically, we respectfully request Ecology clarify:

- Whether the reporting requirement applies only to complaints alleging air quality impacts;
- Whether complaints must be substantiated prior to reporting;
- Whether anonymous complaints are subject to the reporting requirement;
- Whether complaints unrelated to air quality must also be reported; and
- Whether Ecology intends to publish additional implementation guidance regarding complaint reporting expectations.

Administrative requirements are an essential component of environmental compliance. However, compliance programs are most effective when reporting obligations are clearly defined, consistently applied, and appropriately balanced with the operational realities of the industries they regulate.

We respectfully encourage Ecology to consider not only the value of each individual administrative requirement, but also the cumulative compliance burden created when these obligations are implemented collectively across multiple facilities, multiple project locations, and portable operations throughout Washington State.

Providing additional analysis regarding these cumulative impacts would improve transparency, promote consistent implementation, and better support the long-term success of the General Order program.

8. Cumulative Impacts on Washington's Construction Materials Industry

Rock crushing operations do not operate in isolation.

Construction materials are not produced independently, transported independently, consumed independently, or regulated independently. Accordingly, the regulatory framework governing these industries should likewise be evaluated as an interconnected system rather than as separate permitting programs.

Aggregate production is the foundation of Washington's construction materials industry. It supplies the raw materials necessary for hot mix asphalt, ready-mix concrete, public infrastructure, commercial development, residential construction, utility installations, airport improvements, and countless other public and private projects throughout the state.

As such, revisions affecting aggregate production inevitably affect every downstream industry that depends upon a reliable supply of construction materials.

We note that Ecology is simultaneously proposing significant revisions to the General Orders governing rock crushers, hot mix asphalt plants, and concrete batch plants.

While each proposal has been evaluated independently, the practical impacts experienced by Washington's construction materials industry will be cumulative.

Collectively, these proposals introduce revised production limitations, expanded eligibility criteria, additional administrative responsibilities, increased reliance on individual Notice of Construction permits, new operational requirements, expanded recordkeeping obligations, and additional permitting uncertainties.

Accordingly, we respectfully request Ecology identify whether it evaluated the cumulative impacts associated with implementing these revisions across multiple General Orders simultaneously.

Specifically, we respectfully request clarification regarding whether Ecology evaluated potential impacts on:

- Transportation infrastructure delivery;
- Highway preservation and rehabilitation programs;
- County and municipal public works projects;
- Airport construction and maintenance;
- Utility construction and emergency infrastructure repairs;
- Residential housing and commercial development;
- Construction material availability;

- The availability of locally sourced aggregate for rural communities and infrastructure projects;
- Aggregate supply chains;
- Seasonal construction scheduling;
- Workforce utilization and employment;
- Construction costs;
- Emergency response and disaster recovery activities;
- The resilience of Washington's construction material supply chain during periods of increased infrastructure demand; and
- Overall permitting demands placed upon both applicants and the Department.

We also respectfully request Ecology identify whether it evaluated the potential for revised production limitations and reduced General Order eligibility to redistribute aggregate production among fewer qualifying facilities rather than reduce overall statewide demand.

If aggregate production is redistributed rather than reduced, longer hauling distances may increase fuel consumption, truck traffic on regional transportation corridors, transportation costs, project durations, roadway wear, and associated emissions. We respectfully request Ecology identify whether these potential secondary impacts were evaluated as part of the proposed rulemaking.

Environmental regulations are most effective when they are developed with an understanding of the industries they regulate, the supply chains they influence, and the communities they ultimately serve.

While each individual revision contained within the proposed General Order may appear reasonable when evaluated independently, their cumulative effect may be substantially greater than the sum of their individual parts.

We respectfully encourage Ecology to evaluate these broader impacts before finalizing the proposed revisions to ensure environmental objectives are achieved without creating unintended consequences for Washington's aggregate industry, construction materials supply chain, public infrastructure programs, and the communities that depend upon them.

9. Conclusion

North Central Construction, Inc. appreciates the opportunity to provide comments regarding the proposed revisions to the General Order of Approval for Stationary and Portable Rock Crushers.

We recognize and support Ecology's responsibility to protect air quality and public health while ensuring compliance with applicable environmental regulations. We also appreciate the significant effort required to modernize a permitting framework that serves a diverse industry operating under a wide range of geographic, operational, and environmental conditions throughout Washington State.

Our comments are not intended to oppose environmental protection or the modernization of the General Order program. Rather, they are intended to encourage additional transparency regarding the technical analyses, assumptions, and implementation strategies supporting the proposed revisions so stakeholders can better understand both the environmental benefits and the practical implications associated with these changes.

Throughout our review, we identified several areas where additional clarification would strengthen the proposal, including the technical basis supporting the proposed production limits, Ecology's stated production reduction objectives, General Order eligibility criteria, individual Notice of Construction permitting, portable rock crushing operations, administrative requirements, and the cumulative impacts associated with simultaneously revising multiple General Orders affecting Washington's construction materials industry.

We respectfully request Ecology provide additional information regarding these issues before finalizing the proposed General Order to ensure that the final permitting framework remains technically supported, practically implementable, and appropriately balanced with the operational realities of Washington's aggregate industry.

Aggregate is the foundational material upon which nearly every transportation, utility, commercial, residential, and public works project depends. Because aggregate production serves as the first link in Washington's construction materials supply chain, regulatory decisions affecting this industry extend well beyond individual rock crushing operations and ultimately influence the availability of materials needed to construct, maintain, and improve infrastructure throughout the state.

Environmental regulations are most effective when they provide clear expectations, encourage innovation, promote environmental stewardship, and allow regulated industries to invest confidently in cleaner technologies, improved operational practices, and long-term environmental compliance. Regulatory certainty benefits not only permit holders, but also the Department, public agencies, contractors, and the communities they collectively serve.

Environmental protection and responsible infrastructure development should not be viewed as competing objectives. When regulations are supported by sound science, transparent decision-making, practical implementation, and opportunities for technological advancement, they strengthen both environmental stewardship and Washington's ability to construct, maintain, and improve the infrastructure upon which its communities depend.

We also respectfully encourage continued coordination between Ecology, the Washington State Department of Transportation, local agencies, industry stakeholders, and permit holders during development of the final General Order to ensure environmental objectives are achieved while preserving a resilient and reliable construction materials supply chain.

Thank you for the opportunity to provide these comments and for your consideration during development of the final General Order.

Good environmental policy should also be practical public policy—supported by sound science, transparent decision-making, and thoughtful implementation.