Sonia Hitchcock

WASHINGTON CONSERVATION ACTION
*Protecting People & Nature as One*

November 17, 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, respectively.

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 previously submitted a comment letter during the informal public comment period for Chapters 173-476 and 173-400 WAC in May 2026.

The proposed updates to Chapter 173-476 WAC, Ambient Air Quality Standards, will help protect Washingtonians from the impacts of fine particulate matter (PM 2.5) and sulfur oxides, based on the best available science provided by the Clean Air Scientific Advisory Committee of the federal Environmental Protection Agency in 2024. Aligning with the updated National Ambient Air Quality Standards (NAAQS) by strengthening the annual PM 2.5 standard from 12 $\mu g/m^3$ to 9 $\mu g/m^3$, removing outdated SO2 standards, and adding the new annual SO2 standard of 10 parts per billion will protect public health in communities across the state by reducing exposure to these harmful pollutants.

These improvements will especially benefit groups including children, outdoor workers, unhoused people, the elderly, and people with preexisting health conditions who are especially vulnerable to the impacts of air pollution. A reduction in PM 2.5 and sulfur oxides can reduce the number of statewide hospital visits each year, and fewer community members are put at risk for asthma, other devastating ailments, and premature death.

Additionally, the proposed updates to Chapter 173-400 WAC, General Regulations for

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Air Pollution Sources, strengthen guidelines that allow permitting authorities to protect air quality and allow for greater discretion when identifying potential violations of standards within project review periods. Identifying significant impact levels proactively and creating pathways for requiring cumulative impact analyses allows new and modified pollution sources to be assessed and subsequently addressed more efficiently. Notably, these updates ensure that Chapter 173-400 WAC aligns with its intended purpose of limiting air quality contaminant emissions.

Importantly, the proposed inclusion of cumulative impact analyses within Chapter 173-400-113 (3) is an impactful strategy for ensuring emissions from new and modified sources remain within levels that are protective of public health. Establishing this checkpoint will identify existing or prospective violations of the NAAQS and allow for compliance issues to be promptly addressed.

The benefits to human and environmental health that accompany the reduction of PM 2.5 and sulfur oxide pollution exemplify the Environmental Protection Agency's reasoning for strengthening the NAAQS in 2024. WCA supports the Washington State Department of Ecology's prioritization of protecting the health of communities across the state, especially those who bear the greatest burdens of air pollution through ensuring timely updates to the Ambient Air Quality Standards and Significant Impact Levels in alignment with the most up-to-date science.

Sincerely,
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