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**To:** [Ireland, Cynthia D. \(LNI\)](#)  
**Cc:** [Pyke, Chris \(LNI\)](#); [Reul, Nicholas K \(LNI\)](#); [Nicolas Garcia](#); [Liz Anderson](#)  
**Subject:** Draft Wildfire Smoke Rules - WPUDA Comments  
**Date:** Thursday, October 6, 2022 12:15:11 PM  
**Attachments:** [TWH-2022-10-wfs-stakeholder-packet.pdf](#)

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External Email

Cynthia,

On behalf of the Washington Public Utility Districts Association (WPUDA) and our 27 PUD members, we request two changes to the draft wildfire smoke rule for the reasons articulated below:

1) WAC 296-62-08580. The third bullet in the “Notes” section reads:

During emergency response, required use of respirators must be implemented to the extent feasible.

WPUDA’s concern is that a strict reading of this language could create unintended risks. Utility workers often face circumstances where they need to maintain clear and immediate communication capabilities over distance (e.g., when a line person works on elevated and live electrical wires). Wearing respirators in such circumstances could compromise clear and necessary communications and put workers at risk. Therefore, we ask that the language be amended as follows.

During an emergency response, required use of respirators must be implemented to the extent feasible when determined by the employer not to pose a risk to worker safety.

2) WAC 296-62-08550(3)(b) - request for clarity:

The language in this subsection of the rule reads, “The procedures the supervisor must follow if an employee exhibits adverse symptoms of wildfire smoke exposure, including appropriate **emergency response** procedures...”

In an effort to avoid confusion, WPUDA requests that a phrase other than “emergency response” be used in this subsection to avoid potential confusion with the definition of “emergency response” found in WAC 296-62-08520.

WPUDA appreciates the previous efforts by the department on this rule during the emergency phase of its implementation and your consideration of these modifications.

Thank you,

Grant Nelson

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