

# Metropolitan Washington Air Quality Committee

Suite 300, 777 North Capitol Street, N.E. Washington, D.C. 20002-4239 202-962-3358 Fax: 202-962-3203

September 25, 2024

Julie Kimmel,  
Chair, Air and Climate Public Advisory Committee

Subject: Response to ACPAC's Recommendations on Regional Action to Address Air Quality Risks  
Linked to Wildfires and Climate Change

Dear Chair Kimmel,

I am writing in response to your memorandum dated May 20, 2024, addressed to the Metropolitan Washington Air Quality Committee (MWAQC), concerning the Air and Climate Public Advisory Committee (ACPAC)'s recommendations on regional actions to address air quality risks associated with wildfires and climate change.

MWAQC acknowledges the concerns raised by ACPAC regarding the effects of wildfire smoke and climate change on regional air quality. MWAQC is aware that wildfire smoke can worsen air quality and climate change and may further exacerbate the impacts of air pollution on all communities, including overburdened communities in the region.

State and local air and transportation agencies in the District of Columbia, Maryland, and Virginia, in collaboration with MWAQC, have implemented numerous emission control programs over the years. These initiatives have led to significant improvements in air quality in the region. Many of these ongoing programs are anticipated to continue providing air quality benefits in the future.

Below, please find MWAQC's response to each of the four recommendations outlined in your memorandum:

1. MWAQC should account for potential impacts of climate change, including increases in smog-promoting heat waves and exceptional air pollution sources such as wildfires, in its air quality planning and then lead the region's local governments in reducing pollutant emissions sufficiently to offset the impacts of those external factors.

*MWAQC acknowledges the recommendation to account for the impacts of climate change, including increased heat waves and wildfire-related air pollution, in our air quality planning. There are limited local actions that can be taken to mitigate the impacts of wildfires on local PM<sub>2.5</sub> levels. During wildfire events, PM<sub>2.5</sub> levels generated are so high that even after reducing local anthropogenic PM<sub>2.5</sub> levels to zero, the region almost certainly will still experience exceedances. Fortunately, the region's current PM<sub>2.5</sub> levels are below the National Ambient Air Quality Standard (NAAQS). MWAQC will advocate for federal policies that support measures to mitigate the effects of wildfire risks on regional air quality.*

*Climate change may cause warmer temperatures, but very high temperatures are no longer having as much impact on ozone levels and, consequently, on compliance with the ozone NAAQS in our region. This may change if EPA lowers the ozone standard in the future and the region is required to submit an attainment plan. MWAQC would consider a new set of emissions reduction measures at that time to bring the region back into compliance. The good news is that emission control programs implemented at federal, state, and local levels recently will continue to reduce emissions in the future, thus generating continued air quality improvements.*

2. MWAQC should work harder to alleviate air pollution hotspots that harm the health of environmental justice communities. In support of this, MWAQC should do more to monitor air pollution in these communities and provide more effective alerts and early warning for them.

*The MWAQC Environmental Justice Subcommittee is currently closely examining the issue of air pollution impacts on EJ communities in the region. The subcommittee is working on developing an Action Plan that, if successful, could be helpful in addressing such health impacts for residents in these areas of concern. MWAQC will welcome the input of ACPAC on the forthcoming draft Action Plan. Also, it is individual jurisdictions that are responsible for conducting air quality monitoring, so while MWAQC can share information and best practices, MWAQC does not have the authority to monitor air pollution directly in these communities.*

3. Any new urban or industrial development will make it even more challenging to meet our region's clean energy demand and air quality standards (as well as our GHG emission reduction targets). Thus, regional land-use planning and permitting need to consider and firmly address the impacts of proposed projects on our ability to achieve climate, air quality, and justice and equity goals.

*Local governments in the region have authority over land use planning and zoning. Decisions about local land use policy are outside the purview of MWAQC. However, this issue has been identified as a key concern of the public as part of the work of the MWAQC Environmental Justice Subcommittee. MWAQC looks forward to the recommendations of the subcommittee for a possible approach moving forward.*

4. MWAQC needs to continuously track the impacts of wildfires and other external factors on regional air quality and make adjustments in its work as necessary in order to better protect public health.

*MWAQC recognizes the importance of continuously tracking the impacts of wildfires and other external factors on regional air quality. Air quality forecasters from state air agencies and COG have been issuing warnings through social media and tools such as EnviroFlash. We also have been educating the public about wildfires and their impacts on air quality and human health and will continue to do so in the future. We do encourage ACPAC to increase awareness of the various air quality alerts that COG provides.*

Thank you for bringing these critical issues to our attention. We appreciate the opportunity to respond to your concerns and recommendations.

Sincerely,

The Honorable Kenny Boddye

Chair, Metropolitan Washington Air Quality Committee (MWAQC)