

## Canadian Wildfires may cost US Cities Billions

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U.S. cities have made incredible progress in reducing air pollution, and many are very close to meeting all national pollution standards. Being in attainment on pollution standards provides flexibility in issuing emissions permits for new and expanding businesses that can add billions to the economy, creating new jobs while increasing tax revenues. Smoke from distant wildfires causes air pollution standard exceedance days that carry forward for three years in federal attainment calculations. This unfairly delays urban region freedom from restrictive permitting requirements caused by circumstances clearly outside regional control.

The Environmental Protection Agency (EPA) has an [Exceptional Events Rule](#) (EER) to exclude those imported wildfire smoke days from inclusion in determining attainment status.

Unfortunately, the paperwork to file for Exceptional Event status is so egregious states simply don't apply. The problem is compounded as a key piece of evidence: National Oceanic & Atmospheric Administration (NOAA) national wildfire smoke maps are not archived because of cost. The EPA uses these maps to issue air quality alerts (see sample below).



(“Sample Map” Picture Source: <https://weather.com/news/news/midwest-smoke-from-canadian-wildfires-jun2015>)

**There is a NEED for a legislative amendment to create an “automatic” Exceptional Events Exclusion status** anytime a geographical region receives an EPA Air Quality Warning based on wildfire smoke. This amendment should cover any such warning going back to 2020, as frequent wildfire smoke from West Coast states has been regularly causing air pollution exceedance days across the country for years.

**A bill might read something like this:**

*Whereas*, states have made incredible progress in attaining National Ambient Air Quality Standards (NAAQS), and

*Whereas*, wildfire smoke from other regions and countries may lead to air quality exceedance days totally out of local control, and

*Whereas*, the US Environmental Protection Agency has recognized this issue by establishing a process to have such days excluded from NAAQS attainment calculations as Exceptional Events, and

*Whereas*, the Exceptional Event application process is so cumbersome states have avoided applying for Exceptional Event status, and

*Whereas*, key evidence an Exceptional Event has occurred is Wildfire Smoke maps from the National Oceanic and Atmospheric Administration (NOAA), and

*Whereas*, NOAA does not archive the maps,

*Therefore*, the 1990 Clean Air Act is hereby amended to require the Environmental Protection Agency to automatically declare any day the Agency issues an Air Quality Warning for any geographical region for Wildfire Smoke from outside that region, air quality measurements above NAAQS from any Air Quality Monitoring Station covered by the warning will be declared an Exceptional Event to be excluded from determining NAAQS Attainment for that region. *Furthermore*, the Environmental Protection Agency will use the same standard for any historic Air Quality Warning event based on out of region Wildfire Smoke that occurred after January 1, 2020, to declare such days as Exceptional Events. Such Exceptional Events will be determined before certifying air quality data for any given year. NOAA is to establish a Wildfire Smoke Map archive available at no cost to the public for future reference.