

Table 1 - DRAFT Recommended Actions for MWAQC EJ Air Quality Action Plan

Strategy	Recommended Actions	Detail and Considerations	Action Owner	Implementation Timeframe [Short-term / Long-Term]	Priority (L / M / H)	Existing COG or MWAQC Policy?	Existing State Policy?	Budgeted?	Improvement to Air Quality (L / M / H)	Improvement to Disadvantaged Communities (L / M / H)	Implementation Feasibility (L / M / H)	Enforceability (L / M / H)	Economic Feasibility (L / M / H)	Feedback	Challenges	Recommendations	AECOM Comment
Improve Air Quality Regulation	Advocate for stronger ambient air quality standards	Advocate for setting air quality standards based on cumulative risk assessments, not just individual pollutant thresholds.	Federal	Long-term	H				M	H	M	H	H	Supported as a general principle but noted as primarily a federal responsibility. Limited scope for immediate local action.	Long-term focus; reliant on EPA's guidance and standards update cycles.	Clarify MWAC's role in advocacy (e.g., formal support, public comment).	The role/responsibility of who advocates for improved regulation are the entities who are able to interface with federal agencies. Our recommendation should be to charge the "Action Owner" back to state agencies, and not leave it as federal.
Increase Public Outreach and Education	Facilitate Knowledge Sharing of Success Stories	Invite groups to share their approach, including Cheverly, DC EJ Coalition, DC Asthma Coalition, Empower DC, UMD Center for Community Engagement, Campaign to reduce lead exposure and asthma.	Local Communities	Short-term	H	Yes	Partial	Yes	M	H	H	H	M				
Reduce Emissions from Stationary Sources (Commercial & Industrial Facility)	Adopt and implement enhanced enforcement of sources of fugitive dust	- Focus enforcement in marginalized areas and/or high impact residential areas	State and Local Governments	Short-term and Long-term	H		Yes		H	H	H	H	H	Seen as resource-intensive and potentially low-impact compared to other enforcement priorities (e.g., diesel emissions).	Limited enforcement staff; fugitive dust considered a nuisance pollutant with low direct health impact.	Lower priority; provide clearer implementation guidelines and allocate specific resources.	There is evidence from the USEPA (2022) and NIH (2018) that suggests the health impacts from fugitive dust, despite the limited enforcement. Additionally, could it not be considered an enforceable particulate matter? For this reason, we recommend maintaining its priority status. Request for TAC - please describe the limitations in voluntary stricter air quality regulation and enforcement for each region (MD, DC, and VA).
Reduce Emissions from Stationary Sources (Commercial & Industrial Facility)	Adopt and implement enhanced enforcement of sources of pollution	- Focus enforcement in marginalized areas - Narrow down enforcement method by sector	State Government, Partnership	Short-term and Long-term	H		Partial		H	H	L	H	M	Concerns over enforcement staffing and reallocation from existing priorities.		Provide additional enforcement resources or focus on high-impact areas like diesel emissions.	Request for TAC - please describe at what level of government would there be most limitation in enforcement, and please describe the limitations in voluntary stricter air quality regulation and enforcement for each region (MD, DC, and VA).
Reduce Emissions from Stationary Sources (Commercial & Industrial Facility)	Adopt Rule to Require Additional Controls at Stationary Point Sources	- Focus enforcement in marginalized areas and/or high impact residential areas	State Air Agencies	Short-term and Long-term	H		Partial		H	H	L	H	M	High concern over feasibility and enforceability; viewed as economically burdensome with low marginal benefit.	Regulatory resistance; long timelines for implementation; uncertain impact on overall air quality.	Remove from high-priority list or reframe to focus on targeted improvements for specific sources.	Request for TAC - please provide more information on the comment related to the low benefit of this action
Reduce Vehicle Emissions	Retrofit Diesel Vehicles	- Consider focus on public fleets servicing marginalized high impact areas - Apply for DERA Grants	Clean Cities, COG, Local Governments, State Agencies	Short-term and Long-term	H	Yes			H	H	M	L	H				
Reduce Vehicle Emissions	Transition Fleets to Zero-Emission Vehicles	Convert fleets (bus and publicly owned) to zero emission electric models to reduce air pollution	Clean Cities, COG, Local Governments, State Agencies	Short-term and Long-term	H	Partial			H	H	M	M	M				
Reduce Vehicle Emissions	Promote Public Transportation	Increase greener public transportation options to reduce greenhouse gas emissions and improve air quality	State and Local Governments, Transit Agencies	Short-term and Long-term	H	Yes			H	M	M	M	H	Supported in practice but questioned lack of explicit reference to integration with active transportation options like biking and walking		Expand scope to include biking/walking initiatives and offer incentives for shared mobility programs.	Will include noted recommendations.
Reduce Vehicle Emissions	Reduce Idling of Heavy Duty Vehicles	- Consider creation of no-idling zones - Combine with fleet electrification - Enhanced enforcement	State and Local Governments	Short-term and Long-term	H		Partial		H	H	L	M	M	Acknowledged as impactful but limited by available enforcement staff; reallocation of resources is challenging.			Will include noted challenges in action plan
Improve Air Quality Monitoring	Deploy hyper-local air quality monitors/stationary community monitoring networks.	- Air monitoring could be focused in Environmental Justice (EJ) areas for criteria pollutants that exceed NAAQS and/or for pollutants that do not exceed NAAQS (i.e. black carbon) - Develop method to select EJ Areas and deploy air quality monitors; develop quality control plan - Obtain federal funding for hyper-local air quality monitoring program and staffing	State or Local Governments, Citizens, Schools, Other Organizations	Short-term	L	No	Partial	No	L	H	M	L	L	Seen as expensive and requiring significant technical support; high data quality needed.			Economic feasibility rating changed.
Improve Air Quality Monitoring	Deploy mobile air quality monitors to get better resolution on hot spots	Already being done, how expand	State or Local Governments, Universities	Short-term	L	No	Partial		L	H	M	L	M	Clarification needed on monitoring locations (e.g., roadside vs. community areas); hotspot definition unclear.		Define hotspot criteria; prioritize monitoring near high-impact areas such as schools and hospitals.	Suggest this is defined either by TAC or MWCOG.
Improve Air Quality Regulation	Develop new local voluntary bundle measures	- Develop groups of optional air quality control strategies to meet specific pollution reduction targets as part of the State Implementation Plan (SIP) - Voluntary Bundle only applicable for Attainment SIP?	Local Governments, MWAQC, State Air Agencies	Short-term	L	?	?		M	L	M	L	H	Accepted as a reasonable approach, but concerns about applicability in a tri-state context without federal standards or SIP flexibility were raised.	Lack of regulatory clarity for state-level implementation; differences in jurisdictional priorities.		
Increase Public Outreach and Education	Educate the Public on Data Center Control Measures	Acquire increased transparency from data centers about their efforts to implement clean energy solutions	Local and Industry	Long-term	L				L	M	L	L	H				
Reduce Emissions from Stationary Sources (Commercial & Industrial Facility)	Reduce Air Pollution from Data Center Generators	Address public health concerns related to air quality and diesel backup generators used at data centers	State and Local Governments	Short-term and Long-term	L				M	H	L	L	M				
Promote Land Use Planning in Support of Air Quality Improvement	Evaluate how to address local land use zoning for new and existing pollutants sources. Address non-conforming use or permit issues	- Coordinate with local governments - Engage with the Planning Directors and Sustainability Directors	Local Government	Long-term	L	Partial		N/A	H	H	L	L	M				
Promote Land Use Planning in Support of Air Quality Improvement	Limit highway expansion projects in areas disproportionately impacted by poor air quality, consider how to address existing roadways	Seek federal grants to address existing roadway impacts on communities	State and Local Governments	Long-term	L				H	H	M	L	L	Opposed due to potential conflicts with infrastructure needs; focus on EJ integration in planning instead.		Address EJ concerns in NEPA reviews rather than outright limiting projects.	Agree with re-naming/refining
Reduce Emissions from Stationary Sources (Commercial & Industrial Facility)	Increase Jurisdictional Control	- Increase advocacy at the state and local levels to acquire more control despite Dillon's Rule - Target ability to affect stricter building codes and air quality initiatives	State and Local Governments	Long-term	L				M	H	L	M	M				
Improve Air Quality Regulation	Incorporate EJ in State Implementation Plans	Consider how to include EJ considerations in Attainment or Maintenance SIPs	State Air Agencies/MWAQC	Long-term	L	No	?	No	L	H	M	M	H	Challenged due to lack of federal guidance; difficult to address in a tri-state area.		Federal government for guidance; MWAC for planning	There is a guidance document for this developed by the Environmental Justice Leadership Forum/WeACT that we pull from for best practices
Reduce Vehicle Emissions	Reduce Vehicle Miles Traveled for Public Transportation	Use smaller buses for routes that are less frequented to limit unnecessary emissions	State and Local Governments, Transit Agencies	Long-term	M				M	M	M	M	M				
Foster Stronger Partnerships	Partner with health departments	- Study correlations between health impacts and poor air quality - Combine efforts between the health departments and advocacy groups to educate on impacts of poor air quality	State Air Agencies, Local Governments	Short-term	M	No		No	L	H	H	L	M				
Foster Stronger Partnerships	Foster expanded partnerships on hyper-local air monitoring	Expand hyper-local monitoring partnerships	State Air Agencies, Local Governments, Universities, Non-profits, Other Partners	Short-term	M	Yes		Yes	L	M	H	L	H				
Improve Air Quality Monitoring	Develop a Community Monitoring Support Center	May require funding or new partnership	New Partnership?	Short-term	M	No		No	L	H	H	L	H				
Improve Air Quality Monitoring	Develop guide for hyper-local monitoring	- Consider EPA's existing resources (https://www.epa.gov/participatory-science)	MWAQC Staff can create a resource guide to post on-line.	Short-term	M	No		No	L	H	H	L	H				
Improve Air Quality Regulation	Evaluate non-NAAQS air pollutants	Consider how to address air pollutants that are not on the NAAQS list	MWAQC and State Air Agencies	Short-term	M	?	?		M	H	M	L	H	Lack of expertise to determine health thresholds; concern about unclear actionable steps.			Question for TAC and MWCOG: Could the implementation step here be to engage DPH?
Improve Air Quality Regulation	Freeze Permitting	Direct environmental agencies to halt the issuance of permits for new facilities or expansions that would increase air pollution.	State Air Agencies	Short-term	M				M	M	M	H	H	Viewed as unfeasible due to legal and regulatory barriers; unclear definition of "freeze."		Remove from priority actions or reframe as "enhanced permitting reviews" in EJ areas.	This is currently not rated as high priority. We also recommend re-naming/restructuring as enhanced permitting reviews in EJ areas. MWCOG to provide final direction.
Increase Public Outreach and Education	Develop guide for local emission inventory	Provide technical support to local groups wishing to conduct local emission inventories	MWAQC Staff, State Air Agencies, Local government	Short-term	M	No	?		L	M	H	L	H				
Increase Public Outreach and Education	Maintain and up to date background memo on air monitoring technology and uses	An initial memo has been developed; this strategy would be to keep this document updated.	MWAQC	Short-term	M	Yes		Yes	L	M	H	L	H				

Table 1 - DRAFT Recommended Actions for MWAGC EJ Air Quality Action Plan

Strategy	Recommended Actions	Detail and Considerations	Action Owner	Implementation Timeframe [Short-term / Long-Term]	Priority [L / M / H]	Existing COG or MWAGC Policy?	Existing State Policy?	Budgeted?	Improvement to Air Quality [L / M / H]	Improvement to Disadvantaged Communities [L / M / H]	Implementation Feasibility [L / M / H]	Enforceability [L / M / H]	Economic Feasibility [L / M / H]	Feedback	Challenges	Recommendations	AECOM Comment
Increase Public Outreach and Education	Increase Public Outreach and Education on Air Quality	- Emphasize education about the sources of air pollution - Consider a youth-centered education program on air quality and its impacts - Leverage experts in national media to breakdown complex issues	Local Communities	Short-term	M	Partial	Partial		M	H	H	L	M				
Promote Land Use Planning in Support of Air Quality Improvement	Decrease the amount of impervious surfaces to reduce heat islands and air pollutant concentrations	-Increase tree canopy	State and Local Government, Community Organizations	Long-term	M	Yes	Partial		M	H	M	M	M				