



MEMORANDUM

To: EJ Subcommittee Members

From: Robert Christopher, Environmental Planner I

Date: December 13, 2024

Subject: Feedback from MWAQC-TAC on EJ Subcommittee Complete and Priority Actions List

Introduction: This memo provides an overview of the critiques, feedback, and other comments received from the MWAQC-TAC meeting held on December 10, 2024, regarding the EJ Subcommittee's complete and priority actions list. The meeting focused on evaluating the proposed actions, their feasibility, and their potential impact on air quality and disadvantaged communities.

Discussion: The MWAQC-TAC members provided valuable insights and raised several concerns about the EJ Subcommittee's action plan. The key points discussed are summarized below:

1. **General Feedback:**

- There was a consensus that the document's title should be more descriptive to reflect that it is a list of potential actions rather than a finalized action plan.
- Members emphasized the need for clear guidance and support from federal agencies, particularly regarding including EJ considerations in state implementation plans (SIPs).

2. **Specific Concerns:**

- **Enhanced Enforcement:** Members expressed concerns about the feasibility of adopting and implementing enhanced enforcement of fugitive dust sources and pollution. They highlighted that state agencies have limited resources and that enforcement efforts are already prioritized based on existing criteria.
- **Additional Controls on Stationary Sources:** There were significant reservations about the practicality and impact of requiring additional controls on stationary point sources. Members noted that many facilities are subject to stringent regulations and that further controls may not yield substantial air quality improvements.
- **Non-NAAQS Pollutants:** The need to address non-NAAQS pollutants was acknowledged, but members pointed out that state agencies lack the expertise and resources to evaluate and regulate these pollutants effectively. They suggested involving federal agencies and health experts in this effort.

3. **Implementation Challenges:**

- **Budget and Resources:** Members stressed the importance of considering the economic feasibility and resource requirements for implementing the proposed actions. They noted that many actions would require significant funding and coordination among various stakeholders.
- **Local vs. State Jurisdiction:** There was a discussion about the roles and responsibilities of local and state agencies in implementing the actions. Members emphasized that some actions might be more suitable for local implementation while others require state-level involvement.

4. **Recommendations:**

- **Clarify Action Ownership:** It was recommended that the action owners for each proposed action be clearly defined, including the roles of local, state, and federal agencies.

- **Provide Detailed Considerations:** Members suggested adding detailed considerations for each action, including potential challenges, resource requirements, and expected outcomes.
- **Focus on Voluntary Measures:** There was support for including voluntary measures in the action plan, particularly those that could be implemented locally without requiring state or federal mandates.

Conclusion: The feedback from the MWAQC-TAC meeting highlighted several important considerations for the EJ Subcommittee's action plan. The discussions underscored the need for clear guidance, detailed considerations, and a focus on feasible and impactful actions. The EJ Subcommittee will incorporate this feedback and continue to refine the action plan to address the concerns raised.