September 21, 2020

The Honorable Gene L. Dodaro
Comptroller General
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548

Dear Mr. Dodaro,

Increasingly frequent and severe wildfires, as well as lengthening wildfire seasons, are erasing decades of air quality improvements in many areas of the country. According to the U.S. Global Change Research Program’s November 2018 Fourth National Climate Assessment, more frequent and severe wildfires due to climate change can diminish air quality and increase incidences of respiratory illness from exposure to wildfire smoke and particulate matter.1 Further, the American Lung Association’s 2019 State of the Air report showed that Americans are already experiencing worsened particulate pollution due to increased wildfires as a result of climate change, making it harder to protect human health. For several cities, the report showed spikes in episodes of unhealthy particulate pollution in 2019 that were driven by wildfires.²

These unhealthy episodes of particulate pollution are often not factored in when determining whether an area meets Federal standards for air quality. Under the Clean Air Act, wildfires can be considered “exceptional events,” allowing the Environmental Protection Agency (EPA) to exclude air pollution monitoring data affected by wildfires when determining compliance with National Ambient Air Quality Standards.³

EPA is the Federal agency responsible for preserving and improving the quality of our nation’s ambient air to protect human health and the environment through implementation of the Clean Air Act. Aside from EPA, other Federal agencies such as the U.S. Forest Service and the Centers for Disease Control and Prevention have programs to help protect the public from wildfire smoke. In addition, NOAA’s HRRR-Smoke model provides guidance on smoke movement and impacts upon which Federal agencies, researchers, wildfire managers, community leaders, and the public rely.⁴

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3 The Clean Air Act recognized that it may not be appropriate to use the monitoring data influenced by “exceptional” events when making certain regulatory decisions. See EPA’s Final Rule on Treatment of Data Influenced by Exceptional Events at 81 Fed. Reg. 68,216 (October 3, 2016) (codified at 40 C.F.R. § 50-51).
4 https://research.noaa.gov/article/ArtMID/587/ArticleID/2664/When-smoke-is-in-the-air-all-eyes-turn-to-this-NOAA-weather-model
We write to request that the Government Accountability Office (GAO) evaluate the growing effects of increasingly frequent and severe wildfires on air quality. We ask that GAO respond to the following questions:

1. What is known about the effects of climate change on the nation’s air quality and public health from more frequent, severe, and increasingly long wildfire seasons?

2. Over the past 10 years, what have been the trends in the number of exceptional event demonstration applications for wildfires during which air quality monitoring data exceeded National Ambient Air Quality Standards?

3. To what extent do existing Federal programs track, assess, and mitigate the effects of wildfire events on air quality and public health, and how, if at all, do these programs consider changes in wildfire frequency and intensity from climate change?

4. In areas of the United States that have experienced increasingly frequent and severe wildfires over the past 10 years, is there data to suggest a higher rate of mortality and morbidity from the COVID-19 pandemic? Are there links between more wildfires and a greater risk for contracting severe, respiratory-related diseases?

5. What is known about the effects of wildfire smoke on indoor air quality? How much of the adverse health effects from wildfires can be attributed to indoor versus outdoor exposure?

6. What actions could the Federal government take to reduce health effects of air pollution from wildfires?

Your assistance with this matter is greatly appreciated. If you have any questions, please contact Emily McAuliffe of the Majority Committee staff with the Committee on Science, Space, and Technology at (202) 225-6375.

Sincerely,

Mikie Sherrill  
Chairwoman  
Subcommittee on Environment  
Committee on Science, Space, and Technology  
Suzanne Bonamici  
Member of Congress  
Committee on Science, Space, and Technology  

Zoe Lofgren  
Member of Congress  
Committee on Science, Space, and Technology  

Ami Bera  
Member of Congress  
Committee on Science, Space, and Technology
Brad Sherman
Member of Congress
Committee on Science, Space, and Technology

Jerry McNerney
Member of Congress
Committee on Science, Space, and Technology

Ed Perlmutter
Member of Congress
Committee on Science, Space, and Technology

Ben McAdams
Member of Congress
Committee on Science, Space, and Technology