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Kristin Mink, David Snyder, Anita Bonds, Co-Chairs, Metropolitan Washington Air Quality Committee (MWAQC) EJ Subcommittee
Kenny Boddye, Chair, MWAQC
Tom Dernoga, Vice Chair, MWAQC
MWAQC EJ Subcommittee Members
Jolene Ivey, Chair, Climate, Energy and Environment Policy Committee (CEEPC)
Takis Karantonis, Immediate Past Chair, CEEPC
CEEPC Committee Members
777 North Capitol St. N.E.
Suite 300
Washington, DC 20002

RE: Concerns Over Yesterdays MWAQC Technical Advisory Committee Meeting and How Those Concerns Affect Your Meeting Today

Leadership and Committee Members of CEEPC, MWAQC and the MWAQC EJ Subcommittee:

I apologize for writing again, but it is important for you to understand what transpired at the MWAQC TAC meeting yesterday.

The TAC meeting was intended to inform your meetings today on technical issues related to critical policy issues that you are working on for climate change and environmental justice. Virtually nothing of substance was discussed at TAC on either issue. A lot of things were discussed … a lot of words were used. That said … there was no meaningful, policy relevant discussion on the key issues that MWAQC and CEEPC are working on. There is no recording of the meeting.

[1] My name is Tad Aburn. In October of 2022, I was the Chair of MWAQC TAC. For the past 15 years I was the MDE Air Director and an MWAQC member. I have helped write and have submitted over 30 SIPs to EPA over my career. I am now retired … doing volunteer work for overburdened communities in Prince George's County and the District of Columbia.

The meeting appeared to be all about optics … not substance. In other words, the COG staff is likely to say that "TAC met to discuss critical issues on climate change and environmental justice" … but they actually avoided all meaningful discussion. What I heard for each agenda item (from highest to lowest priority) is below.

Agenda Item 5 - ACPAC Memo on Air Quality and Climate Change

- The briefing did not ask TAC to discuss the science or technical aspects of the three key points that ACPAC made. These three key points are:
    - MWCOG needs to treat the climate change crisis as an urgent problem. The science says so.
    - Update the outdated and weak MWCOG climate change goals. They are inconsistent with the science and the goals set by more proactive MWCOG members like Maryland and Montgomery County.
    - Address environmental justice. The science says that air pollution in EJ areas is a high-risk, urgent problem.
- The briefing did not even address the ACPAC recommendation to CEEPC … just the ACPAC recommendation to MWAQC. It appeared that TAC did not understand that TAC advises both committees.
- A lot of words were said but there was no meaningful discussion of the key issues
- The ACPAC Chair, Co-Chair or one of the ACPAC members who drafted the ACPAC recommendations should have been asked to provide this briefing. Many of the ACPAC members are technical experts on the issues they raised in their unanimously adopted recommendations. They were not even invited to the meeting.
- Many of the TAC members have significant technical experience on the three key points above. I know this because I have worked with many of the TAC members in the past when I was the Air Director in Maryland. These TAC members said nothing at the TAC meeting. Who knows why?
- It is clear, based upon the questions asked, that the members of TAC have not read any of the public comments submitted to MWAQC or TPB on the three key points in the ACPAC recommendation.
    - Stupid questions like "what is the definition of an air pollution hotspot" were made.
- Because the technical public is banned from speaking and asking questions during all TAC meetings there is no way for outside experts to provide input or to correct misinformation being presented.

Agenda Item 6 - Update on EJ Subcommittee

- Five minute agenda item.
- Nothing was said of substance - just when meetings took place.
- None of the technical issues raised by the numerous comments to MWAQC on May 22nd were discussed.
- It appears that TAC members do not even understand that air pollution issues in EJ areas go well beyond just ozone and fine particles and that other issues like diesel exhaust and the cumulative exposure to multiple air pollutants are what drives the high risk and inequity in EJ areas.

Agenda Item 4 - Air Quality Monitoring in the Washington Region

- This agenda item was intended to address MWAQCs request for a simple, plain english briefing on why existing monitors do not address EJ areas and why some EJ areas are building their own “community scale” monitoring networks.
- The briefing that was provided was very technical, did not use “plain english” and did not answer the MWAQC questions.
- An early “plain english” draft prepared by expert stakeholders of the briefing requested by MWAQC was not discussed or even made available to TAC.

Agenda Item 1 - Montgomery County Plan for a Large Electric Vehicle Depot

- A very good informative presentation.
- If TAC did not have critical policy relevant technical decisions to make during yesterday's meeting this would have been a great agenda item #1. Unfortunately it consumed a lot of time that should have been used for the critical, more policy relevant detailed technical discussion on other agenda items.

Agenda Item 3 - Ozone Season Update

- A worthless briefing that repeated what has been said at the last ten TAC meetings was provided. Everyone knows a lot of progress has been made.
- To make this briefing more valuable it needs to include issues like:
    - How the NOx reduction driven “tipping point” atmospheric chemistry is likely to continue to reduce ozone levels into the future.
    - What does the monitoring in EJ areas say?
    - Won’t the key actions being taken to address climate change (energy transformation, zero-emission transportation, etc.) continue to dramatically reduce ozone and PM levels?

    - Why the Clean Air Act requirements for ozone and PM will almost certainly never be a significant issue again (still lots of paperwork to do) in the DC area?

Agenda Items 1 and 7 - Call to Order and State and Local Updates

- Public excluded from the meeting for the first 15 minutes so the public had no way of knowing who was even on the call. My guess is the attendance (by others than the states and DC) was dismal and that local government participation (other than the Montgomery County presenter) was nil.
- As usual, no updates from anyone … Everyone just wanted the meeting to end.

In closing, the TAC meeting was very bad. It is another example of how optics appears to be more important to the COG staff than substance. In other words, the meeting will be used to make it look like the MWCOG policy committees are getting solid technical input … but they really are not getting any technical input at all. Banning technical experts from participating in TAC meetings is a key strategy used by the COG staff to implement the "optics over substance" approach.

Thank you again for allowing public comment. I applaud MWAQC for moving forward to begin to address environmental justice, a very serious public health protection issue in many communities across the MWAQC region. I urge CEEPC to take action to fix the climate change problems identified by ACPAC on the lack of urgency on the climate crisis and weak climate change goals at MWCOG.

Respectfully,

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Cc: MWAQC Members
Charles Allen, Chair, MWCOG Board
Cristina Henderson, Chair, TPB
Julie Kimmel, Chair, ACPAC
Roger Thunell, Chair MWAQC TAC
Alexander Mandell, USEPA