



# Maryland

## Department of the Environment

Larry Hogan, Governor  
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary  
Horacio Tablada, Deputy Secretary

March 31, 2022

Ms. Carla Longshore, Associate Director  
Transit Delivery System  
District Department of Transportation  
250 M Street, SE  
Washington, DC 20003

Dear Ms. Longshore:

I am reaching out regarding the proposed maintenance yard for the DC Circulator to be located at 1201 Claybrook Road in Cheverly, Maryland. The Maryland Department of the Environment (MDE) is working in partnership with the Cheverly community and Dr. Sacoby Wilson, Director of the University of Maryland's Center for Community Engagement, Environmental Justice, and Health, to reduce emissions and risk in the Cheverly area, a community with concerns over environmental justice (EJ).

The partnership has already implemented a hyper-local air monitoring network, <https://sites.google.com/site/cheverlygreenplan/now-under-way-current-initiatives/the-air-we-breathe>, and MDE has implemented a targeted inspection program that uses the air monitoring data and wind information to target stationary and mobile source inspections and enforcement actions. A report on this MDE effort identified ten recommendations on specific actions that could be implemented in partnership with the community to further reduce exposure to air pollution and risk: <https://mde.maryland.gov/programs/air/AirQualityCompliance/Documents/CheverlyStudy.pdf>

One of those recommendations is that MDE assist the community to make sure that any analyses completed by DC would ensure that air pollution and EJ issues associated with the proposed facility are extremely robust and fully address the community's concerns.

In the summer of 2021, MDE began discussions with Kelly Crawford, Associate Director of DC's Department of Energy and Environment, about some of the basic analyses that need to be included in the air pollution and EJ risk analyses being planned by DDOT. We have been told by Ms. Crawford that MDE will be included in the discussions as DDOT defines the air pollution and EJ analyses that will be performed. This was confirmed at a Cheverly Town Council meeting on February 22, 2022, where DC discussed the project.

During our discussions with Ms. Crawford, MDE has begun to identify some of the most important issues that DDOT needs to include in the air quality and EJ analyses. A few of these issues are summarized below:

- Timing – what is the specific timeline for this project that spells out anticipated deadlines for the funding decision, the beginning of the baseline ambient air monitoring, construction, and operation?
- The framework of the Maryland Air Toxics Regulation must be used to demonstrate that public health is protected. Analyses must include all toxic air pollutants, the construction and operation phases of the project and direct and indirect (induced) emissions. The analysis must address cumulative impacts and cancer risk.
- New emission reductions or "offsets" must be found and purchased. This offset process should be similar to and at least as stringent as the Clean Air Act, New Source Review offset requirements. As part of this offset process, DC should initiate efforts to reduce local, Cheverly area diesel emissions using the Diesel Emission Reduction Act (DERA) or DCDOT/DGS funding. Other nontraditional offsets need to be considered. For example, DC should consider funding local, Cheverly area EV infrastructure.
- DC should also consider other efforts to address community concerns over air pollution and other issues like traffic and jobs.

In closing, I am asking to meet with DDOT, DGS, and DOEE to discuss these issues. MDE is currently working with a small group of residents, and we would like to see these individuals invited to that meeting as well. Thank you in advance for your consideration.

Sincerely,



George (Tad) S. Aburn, Jr., Director  
Air and Radiation Administration

cc: Hannah Ashenafi  
Kelly Crawford  
Gary Cunningham  
Councilmember Thomas Dernoga  
Dylan Galloway  
Tiwana Hicks  
Karen Moe  
Mayor Kayce Munyeneh  
Heather Murphy  
Michelle Russell  
Sheila Salo  
Dr. Sacoby Wilson