

November 30, 2023

Hon. Anita Bonds, Chair
Metropolitan Washington Air Quality Committee

Re: MWAQC needs to address Non-tailpipe vehicle air pollution

Dear Chair Bonds and Committee members,

The Coalition for Smarter Growth asks the Metropolitan Washington Air Quality Committee to take up the issue of non-tailpipe air pollution from cars and trucks in its work program and coordination with area transportation Metropolitan Planning Organizations (MPOs).

CSG applauds the region's air quality progress over the previous decades, reducing VOC and NOx pollution. However, mounting evidence shows that vehicle tires, brakes, and toxic roadway dust are harming human and environmental health, that these sources largely escape regulation, and that this problem will only grow worse (see this [summary](#)):

- In regions like ours that have cleaned up car and truck exhaust, PM 2.5 and PM 10 emissions from tires and brakes are greater than emissions from tailpipes.
- Tire particulate emissions from electric vehicles are 20% greater than those from similar gas/diesel-powered vehicles, due to the greater weight of EVs.
- Half to a majority of the microplastics in our waterways and oceans are from tires. For example, tire wear particles constitute half of the San Francisco Bay microplastics – so you can imagine a similar impact on the Potomac and Anacostia Rivers and Chesapeake Bay.
- The [Imperial College of London](#) found that tire wear particles likely contribute to a range of negative human health impacts across major organ systems.

Therefore, we ask MWAQC to:

1. Put Non-Tailpipe Vehicle Air Pollution in the MWAQC FY25 work program

While MWAQC's primary responsibilities are implementing federal air quality statutory requirements, it is also encouraged in its bylaws to "perform other functions to improve regional air quality, including the evaluation and consideration of innovative and non-regulatory initiatives designed to expedite or enhance attainment and maintenance of air quality goals." MWAQC is the appropriate body for regional leadership and coordination on addressing non-tailpipe air pollution from cars and trucks.

2. Address the role of Vehicle Miles Traveled (VMT) in air quality outcomes, by asking for VMT performance targets at the region's transportation MPOs

Vehicle tailpipe emissions mandates and the transition to EVs will not address non-tailpipe particulate and chemical pollution (which could grow worse with more and heavier vehicles driving more miles). Accelerating the region's shift to more sustainable modes of travel and shorter trips through land use planning and housing policy, are critical for desired health, social, environmental, and economic outcomes. **Reducing per capita VMT** is a clear performance metric for these issues – and is also critical for the MWCOG region to achieve its greenhouse gas reduction goals. TPB and other agencies across the country have found that EV adoption won't be enough in the on-road transportation sector to meet COG, local, state and federal climate goals.¹

MWAQC should recommend that TPB and other MPOs in its area such as FAMPO, adopt per capita VMT reduction targets of 20% for interim years and 25-30% by 2050.

3. Include Non-Tailpipe vehicle pollution in your environmental justice efforts

CSG appreciates the efforts of MWAQC to address disparate impacts of pollution on communities of color and low-income residents and workers. The proximity to high-volume roadways means that these communities could continue to be exposed to unacceptable levels of particulate matter and other toxins, even as our fleets shift to electric vehicles.

Note that at the September meeting of the MWCOG Climate, Energy and Environment Policy Committee (CEEPC), non-tailpipe pollution came up, and Jeff King, COG Climate, Energy & Air Director, suggested that MWAQC would be the appropriate venue to address this.

Thank you for your consideration of this timely issue.

Bill Pugh, AICP CTP
Senior Policy Fellow

CC: MWCOG Air and Climate Public Advisory Committee
MWCOG Climate, Energy and Environment Policy Committee
National Capital Region Transportation Planning Board

¹ TPB's [Climate Change Mitigation Study of 2021](#) found that a rapid shift to EVs by itself is not enough to meet COG's GHG goal. The region must reduce per capita light duty VMT by 20% by 2030 (from the pre-pandemic level), with further reductions beyond to reduce transportation emissions at the scale needed in the *MWCOG 2030 Climate and Energy Action Plan*. This level of VMT reduction is needed *on top of* the region's goal for 50% of car sales to be EVs in 2030. TPB's long-range transportation plan *Visualize 2045* would only reduce per capita passenger car VMT by a modest 5% by 2045, falling well short of the level needed to meet MWCOG GHG targets.

The State of California, which has the nation's most ambitious EV adoption programs, found that it must also achieve per capita VMT reductions of at least 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045, to meet its climate goals (CARB 2022 Scoping Plan).

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December 5, 2023

Anita Bonds, Chair, MWCOG Metropolitan Washington Air Quality Committee
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Committee Members, MWAQC
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RE: Comments on Inclusion of Stakeholders as Part of the Environmental Justice
Subcommittee

Chairwoman Bonds, MWAQC members:

Thank you for allowing public comments to be submitted to MWAQC. I look forward to the opportunity to work with the new Environmental Justice (EJ) Subcommittee that MWAQC has created.

My comments today focus on the role of stakeholders as part of that process. As you know, other MWAQC Subcommittees, like MWAQC TAC (Technical Advisory Committee) formally include stakeholders as members of the Subcommittee. Given the focus of the new EJ Subcommittee, I would urge you to use the Chairs and the Subcommittee Chairs authority to name a small number of stakeholders to be formal members of the new Subcommittee.

I'm sure there would be an application process, but I would volunteer to work with the MWAQC EJ Subcommittee on this critical issue. As you know, I am now working with several environmental justice communities in both Prince George's County and the District of Columbia and have considerable experience in the area of air pollution. I could also provide recommendations on other stakeholders who would be very interested in participating ... Some from the communities I am working with, some who are considered technical experts on monitoring and other technical issues linked to environmental justice.

I would also like to provide comment on the briefing you will receive as Agenda Item #

5 ... the “Hyperlocal/Community Monitoring Panel”. I believe these two briefings will be a very good start to understanding the air monitoring that is finally being done in and around EJ communities. They are both presentations by government officials and I am certain they will be very nice and deliver a message that says “we are concerned ... we are looking”.

What they will not say is that the levels of some pollutants in these communities are shocking and warrant strong, immediate action. In a briefing to MWAQC on February 22, 2023, Dr. Russell Dickerson from the University of Maryland (UM) called the air pollution levels he was measuring in the Ivy City area of the District of Columbia (DC) ... “Alarming”.

There are other researchers in the DC area reaching similar conclusions. George Washington University, Trinity and Howard University are conducting EJ research. I would urge you to include a briefing from the research community at future MWAQC meetings. This kind of a briefing would also be very important to the new EJ Subcommittee as the research results convey a true sense of urgency to that Committee's work. I offer to reach out to these researchers if needed.

In closing, as the new EJ Subcommittee begins to meet, another very important briefing should focus on the emission reduction “Actions” that can be taken by MWCOG and its members to begin to reduce emissions and risk in EJ Communities. Again, because of the urgency of the problem, it is critical for the government to immediately begin to take common sense actions. There is a great example of an action-oriented EJ effort in Prince George's County. This community based effort, being done in partnership with the Maryland Department of the Environment (MDE), the UM and Prince George's County includes the following MDE-led early action programs:

- A targeted inspection and enforcement effort (using community-based air monitoring data) to ensure that emissions from stationary sources, like aggregate plants and metal shredders, are minimized,
- A community focused initiative to reduce diesel emissions from vehicles and potentially illegal truck idling (in partnership with the Maryland State Police),
- An initiative to address Transportation Related Air Pollution (TRAP),
- Another enhanced inspection and enforcement effort to ensure that fugitive dust from businesses, construction sites and warehouse areas are minimized, and
- Several other efforts targeting specific actions needed to address the inequitable exposure to air pollution in EJ communities.

I urge you to move quickly to address environmental justice across the region. I have also attached the short EJ Framework that I recommended to MWAQC in June of 2023. The EJ Subcommittee may find it useful.¹ Please let me know if I can help with this critical effort.

Respectfully,

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Cc: MWAQC Members
Reuben Collins, Chair, TPB
Takis Karantonis, Chair, CEEPC
Era Pandya, Chair, ACPAC
Julie Kimmel, Vice Chair, ACPAC
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Cristina Fernandez, USEPA
Angus Welch, USEPA

¹ As background, My name is Tad Aburn. In 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 40 year career at MDE. I was also a two-time President and the State Criteria Pollutant Committee Chair for the National Association of Clean Air Agencies (NACAA). NACAA is a national organization noted for its expertise on air pollution and environmental justice. I am now retired ... and doing volunteer work for overburdened communities in Prince George's County and the District of Columbia.

ATTACHMENT

Three Basic Steps that Need to be Implemented by MWCOG to Begin to Address Environmental Racism in the Washington, DC Region June 1, 2023

Introduction - This short white paper provides a basic framework that could be considered by the Metropolitan Washington Air Quality Committee (MWAQC) as they begin to develop the environmental justice program approved at the Committees May 24, 2023 meeting.

Step 1 - Rethink and relocate current projects that are in the works that add to the existing environmental burden and make air pollution hotspots and racial inequity worse in communities of color throughout the Washington DC region.

Many of these projects, like the Claybrick Road project and the Ivy City project can be built elsewhere ... in an area that does not impact a community of color or in an area with a larger buffer between the emissions from the project and the communities that breathe the air.

Step 2 - Begin to work with both county level and state level MWAQC members in VA, MD and DC to implement programs to reduce the existing inequitable exposures (hot-spots) to air pollution in communities of color throughout the region.

The efforts in Maryland provide a template to begin this work. The Maryland efforts involve:

- *Building community partnerships.*
- *The establishment of community based, hyper-local air monitoring networks.*
- *Implementing focused community-based inspection and enforcement programs to use existing authorities to begin to reduce emissions in communities of color for sources like diesel trucks, fugitive dust and air toxics from stationary sources.*
- *Adopting new regulatory or legislative programs to address difficult issues that are not covered by existing authorities like multi-pollutant, cumulative exposure to many air pollutants at the same time.*

Maryland has begun to implement community partnerships, enhanced, community based enforcement programs and has proposed three new regulatory initiatives to begin to address the issue of environmental racism. The MWCOG staff has several reports summarizing this work in Maryland.

Step 3 - Begin regional discussions on how to change existing air quality, transportation and land-use policies that are unintentionally driving environmental racism in the region. This is a very difficult step and will take time.

The most critical policy change that is needed is to rethink current land-use policies that continue to encourage dirty businesses to be built in communities of color because of antiquated zoning concepts.

This unintended consequence associated with decades of well intended policy is not all that complicated:

- *Areas are zoned for medium to heavy industrial use*
- *Dirtier businesses, warehouses, other associated operations and traffic move into that area*
- *Housing costs drop in that area*
- *Low income communities, sometimes communities of color and other overburdened communities, move into that area*
- *More dirty businesses, warehouses, other associated operations and traffic continue to move into that area*

This is a very difficult problem to fix, but local governments in areas like California are working to begin to reverse the problem by considering environmental justice as part of land use and zoning decisions.