



UNIVERSITY OF  
MARYLAND

SCHOOL OF PUBLIC HEALTH  
*Maryland Institute for Applied and Environmental Health*

CEEJH  
2234 School of Public Health Bldg  
College Park, Maryland 20742-2611  
301.405.3136 TEL, 301.405.8397 FAX

December 7, 2022

Thank you for providing the opportunity to submit comments for consideration at the December 7, 2022 meeting. I am writing today to comment on the proposed maintenance yard for the DC Circulator to be located at 1201 Clay Brick Road in Cheverly, Maryland On behalf of the Center for Community Engagement, Environmental Justice, and Health. CEEJH has worked as an environmental health organization in the areas of exposure science, environmental justice, environmental health disparities, community-based participatory research, water quality analysis, air pollution studies, built environment, industrial animal production, climate change, community resiliency, and sustainability. I work primarily in partnership with community-based organizations to study and address environmental justice and health issues and translate research to action.

As you meet today, the District of Columbia is planning to build a dirty bus maintenance and training facility next to and directly upwind of Cheverly and Seat Pleasant in Prince George's County, Maryland. These are communities of color who have long faced pollution burdens associated with environmental pathogens. This proposed project will contribute an increased environmental burden in a community that is already overburdened.

The proposed facility will lead to a sharp increase in traffic pollution in the area surrounding Cheverly. Harmful traffic related pollutants include PM<sub>2.5</sub>, Ground level ozone, NO<sub>x</sub>, and benzene. Exposure to these pollutants in particular PM 2.5 are linked to serious health problems including heart disease, premature death, stroke, and aggravated asthma.

Cheverly, MD is a community overburdened by environmental pathogens and the proposed facility will exacerbate existing air quality concerns. The overall MD EJSCREEN Index for Cheverly is 0.66, indicating that the town is an area of high environmental justice concern, when compared to the rest of Prince George's County (EJ Index = 0.58) and state of Maryland (EJ Index = 0.53). Cheverly had an extremely high exposure score (0.87) and environmental effect score (0.91), compared to county (0.59 and 0.49) and state (0.49 and 0.55). Through a partnership with MDE and the town of Cheverly and other community partners we were able install 20 PM 2.5 monitors in the town of Cheverly. Data from these monitors shows air quality in Cheverly is constantly above the standard set by the WHO and EPA for allowable PM 2.5 during rush hour as well as off peak hours. The addition of a diesel bus facility repeats a disastrous pattern of citing polluting facilities in overburdened communities of color.



Overburdened communities should be the primary benefactor from a transition to cleaner fuels rather than be the depository for outdated technology. By doing so, the Washington Metropolitan Air Quality Community can effectively scale Justice40 benefits, outlined by the Biden-Harris Administration, and provide direct environmental benefits to communities .

### EPA EJSCREEN Report

Environmental justice screening and mapping (EJSM) tools are a prime example of a screening mechanism of cumulative impacts. An example of this is EPA EJSCREEN. **Figure 1** presents an EJSCREEN analysis of the 1-mile buffer ring directly surrounding the coordinates of the proposed project, which do not differ from the above mentioned analysis (EPA, 2021). Observed are elevated percentiles of diesel particulate matter, air toxics cancer risk, and respiratory hazard, relative to the rest of Maryland and the United States. Therefore, residents already face environmental and health burdens, presenting a baseline risk assessment for the community.

**EJScreen Report (Version 2.1)**  
1 mile Ring Centered at 38.907127,-76.907086  
MARYLAND, EPA Region 3  
Approximate Population: 14,204  
Input Area (sq. miles): 3.14

Selected Variables	Percentile in State	Percentile in USA
<b>Environmental Justice Indexes</b>		
EJ Index for Particulate Matter 2.5	76	78
EJ Index for Ozone	48	84
EJ Index for Diesel Particulate Matter*	89	92
EJ Index for Air Toxics Cancer Risk*	76	88
EJ Index for Air Toxics Respiratory HI*	77	89
EJ Index for Traffic Proximity	75	87
EJ Index for Lead Paint	85	90
EJ Index for Superfund Proximity	87	91
EJ Index for RMP Facility Proximity	94	94
EJ Index for Hazardous Waste Proximity	77	83
EJ Index for Underground Storage Tanks	83	84
EJ Index for Wastewater Discharge	10	5

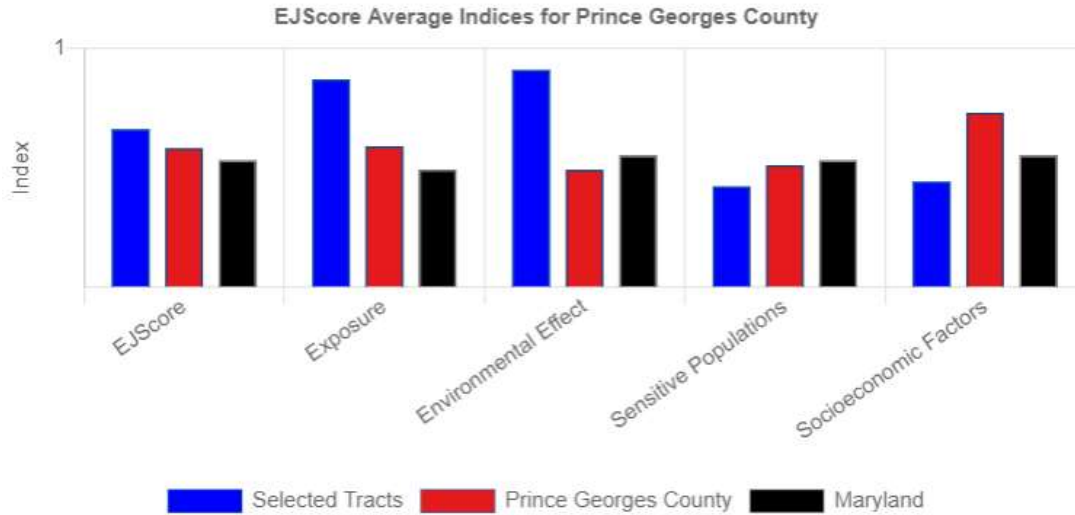
EJ Index for the Selected Area Compared to All People's Blockgroups in the State/US

**Figure 1:** EJSCREEN analysis of the 1-mile buffer ring surrounding the coordinates of the proposed project.

The Maryland Environmental Justice Screen Tool (MD EJSCREEN) is a state-specific EJSM tool that utilizes local data, is customized to local community concerns, and is useful for state, county-level, and municipal policy making (Driver et al., 2019). It combined pollution burden and population characteristics to create an EJ Index. The overall MD EJSCREEN Index for Cheverly is 0.66, indicating that the town is an area of high environmental justice concern, when compared to the rest of Prince George’s County (EJ Index = 0.58) and state of Maryland (EJ Index = 0.53). When assessing the individual domains, Cheverly had an extremely high exposure score (0.87) and environmental effect score (0.91), compared to county (0.59 and 0.49) and state (0.49 and 0.55) averages, respectively. Noticeably, the scores for sensitive populations and SES were low (0.42



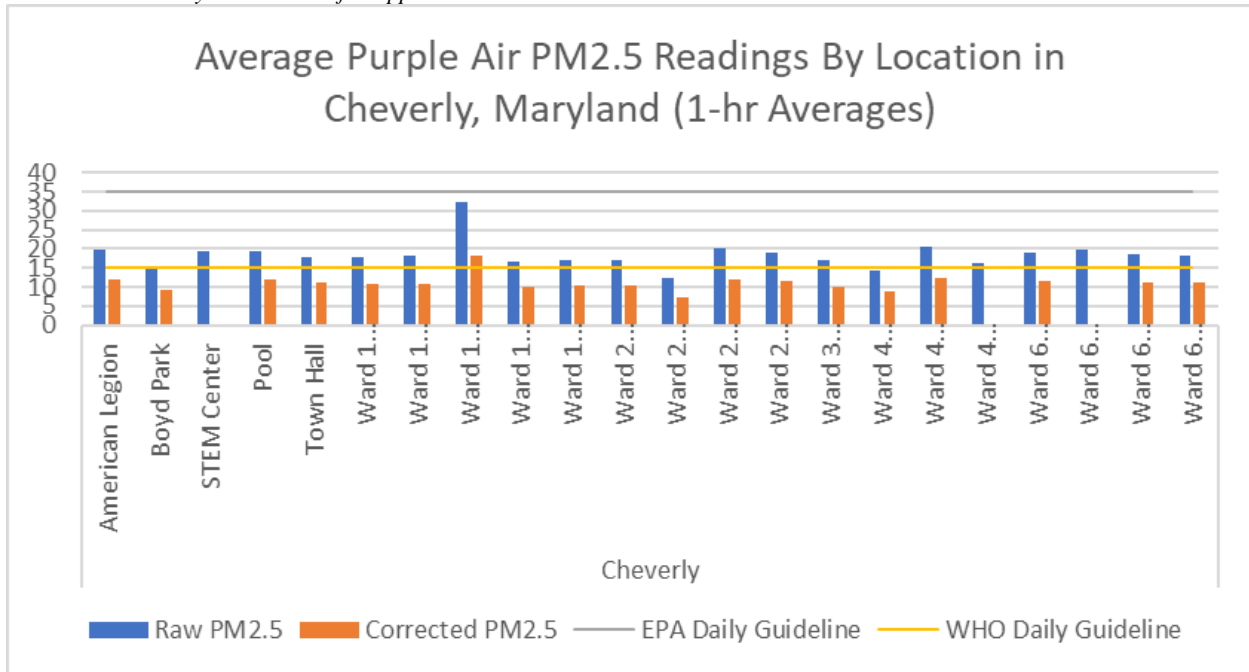
and 0.44, respectively), compared to the County (0.51 and 0.73) and state (0.53 and 0.55) averages. The full breakdown of EJ Indices are revealed in **Figure 2**.



**Figure 2:** MD EJSCREEN Indices by domain for Cheverly, Maryland compared to Prince George’s County, Maryland and the State of Maryland

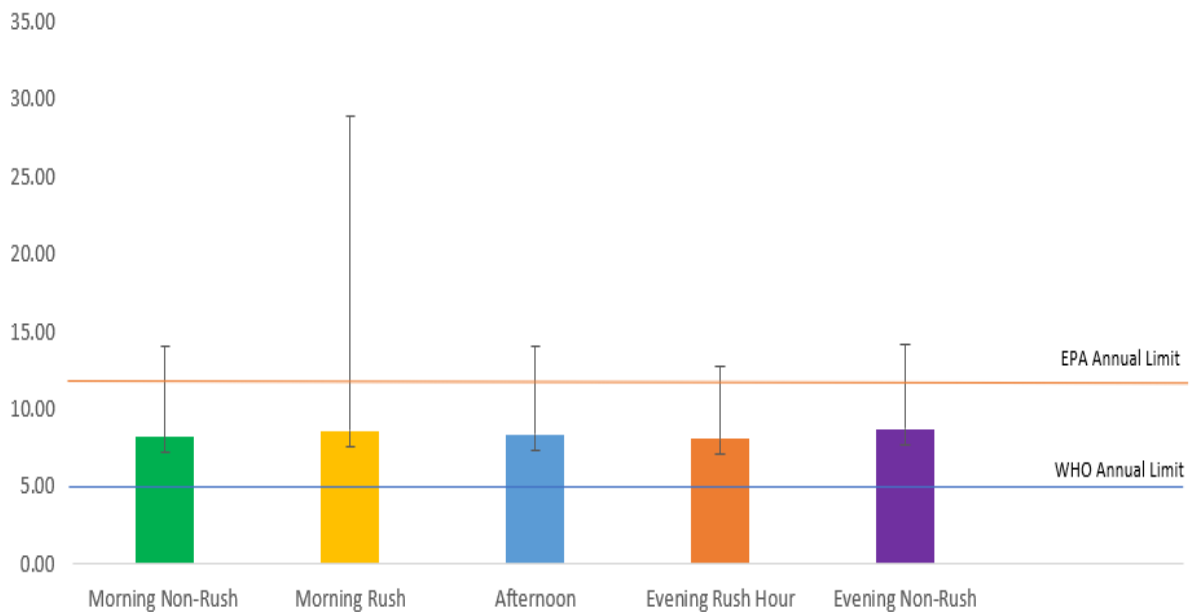
### Air Quality Monitoring Results for Cheverly, Maryland

CEEJH has performed a comprehensive EJSCREEN analysis for the greater Cheverly, Maryland region as part of the hyperlocal Purple Air Monitoring Project that began in 2019, which is impacted by the proposed project on Claybrick Rd. This is an ongoing partnership, whose integral partners include: CEEJH, the Maryland Department of the Environment (MDE), and the Town of Cheverly (MDE, 2021). This analysis has been presented at various venues, from local community events to major regional conferences such as the University of Maryland’s Annual Symposium on Environmental Justice and Health Disparities. Purple Air monitors (N = 23) were placed throughout Cheverly, including within 0.25 km of the proposed site, to assess concerns over air pollution related to local industrial activities and traffic. Moreover, we compared community-level data with PM2.5 measurements collected at MDE reference sites to assess whether Cheverly levels were consistently higher. PM2.5 levels of our hyperlocal network were generally higher than these national and regional trends. The overall averages (both raw and corrected values) for the Purple Air monitors that met our quality assurance protocols are shown in **Figure 3**.



**Figure 3:** Comparison of Average Purple Air Readings to EPA (35 ug/m3) and WHO (15 ug/m3) Daily Guidelines

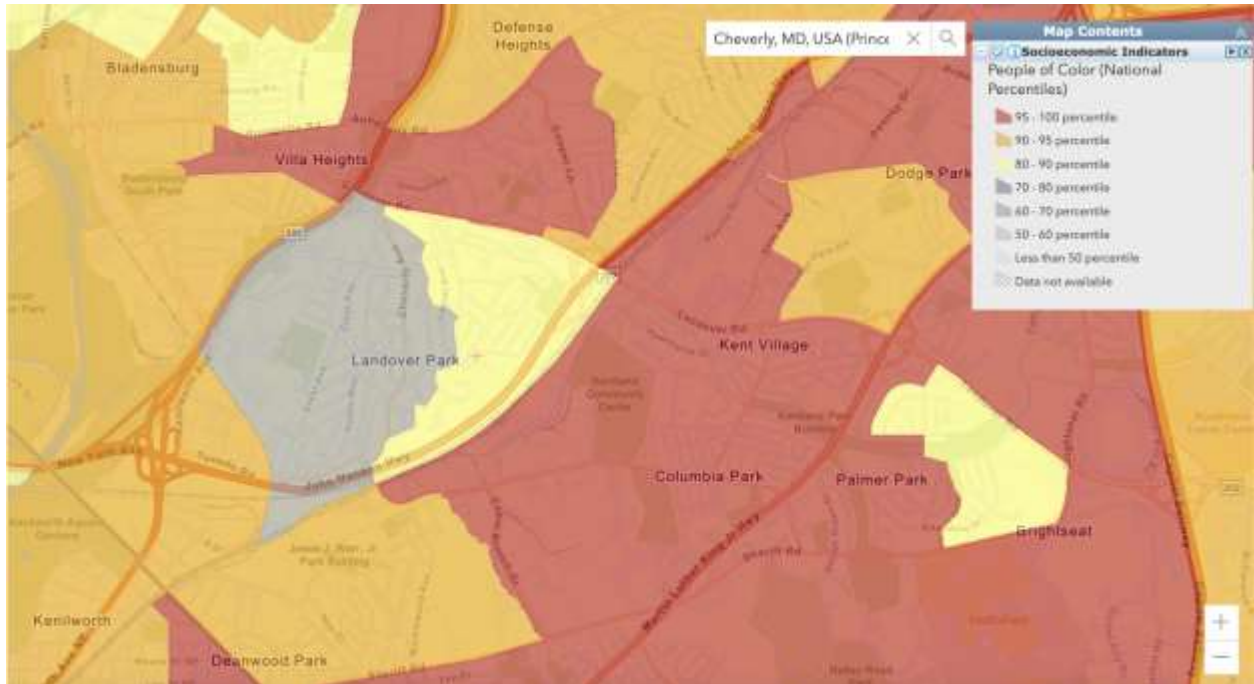
Additionally, the diurnal analysis found that the rush hours had statistically significantly higher PM2.5 levels than off-peak hours **Figure 4**.





**Figure 4.** Diurnal investigation of PM2.5 levels, divided into 5 time bins: morning non-rush (1:00-5:00 am), morning rush (6:00-11:00 am), afternoon off-peak (12:00-2:00pm), evening rush (3:00-8:00pm), and evening off-peak (9:00pm-12:00am).

It is not a new fact that diverse/minority communities are disproportionately impacted by environmental hazards compared to those of predominantly white communities. Cheverly Maryland is a diverse community, with 99% being people of color. This is within the 90-100th percentile in the US when it comes to people of color. Meanwhile the state average for people of color in the state of Maryland is 50%, and in the US 40%.



**Figure 5:** The national people of color percentiles of the different regions of Cheverly, Maryland are shown. Most regions are within the 90-100th percentile.

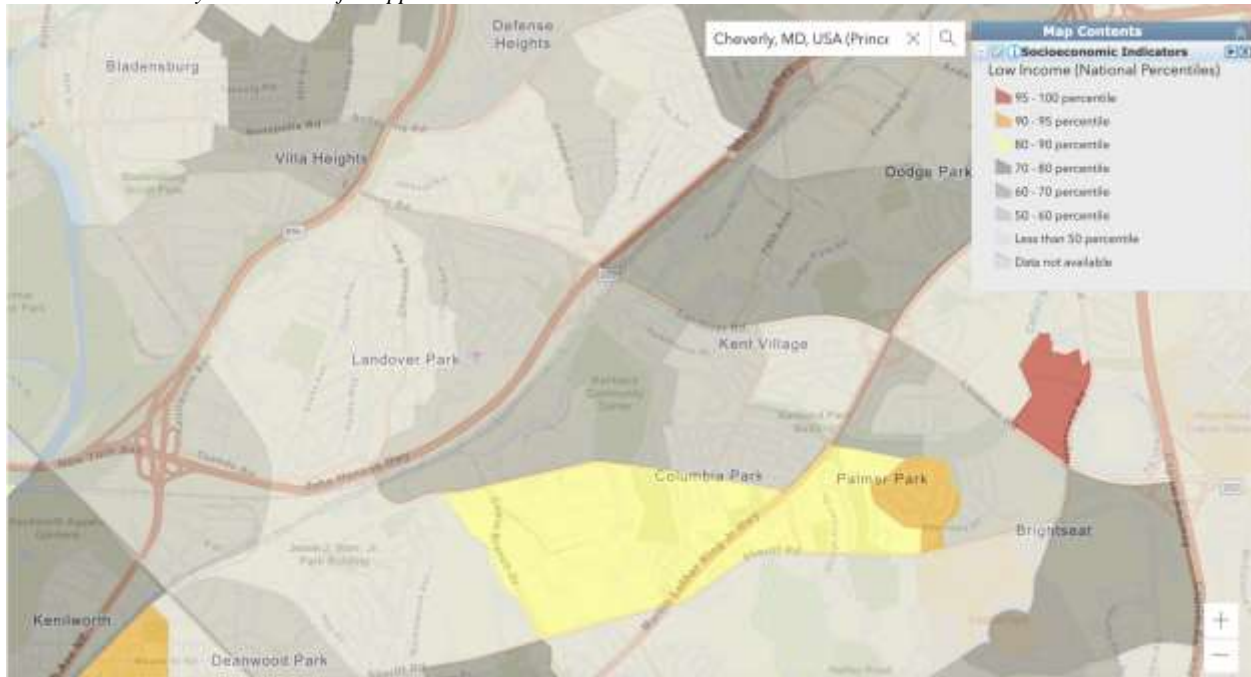
Communities with a high percentage of low-income households are also disproportionately impacted by environmental hazards. 34% of the population of Cheverly is low income. This is compared to the state average of 21%, while in the US it is 30%. It is in the 60th percentile in the USA for low-income communities. The area around it shares very similar statistics.



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**Figure 6:** The national percentiles of low income households in the different regions of Cheverly are displayed. Most regions fall within the 50-80th percentile, with a few areas that are within the 80-100th percentile.

**Figure 7** presents an EJSCREEN analysis of the 1-mile buffer ring directly surrounding the coordinates of the proposed project. Observed are elevated percentiles of diesel particulate matter, air toxics cancer risk, and respiratory hazard, relative to the rest of Maryland and the United States, presenting a baseline community risk assessment.

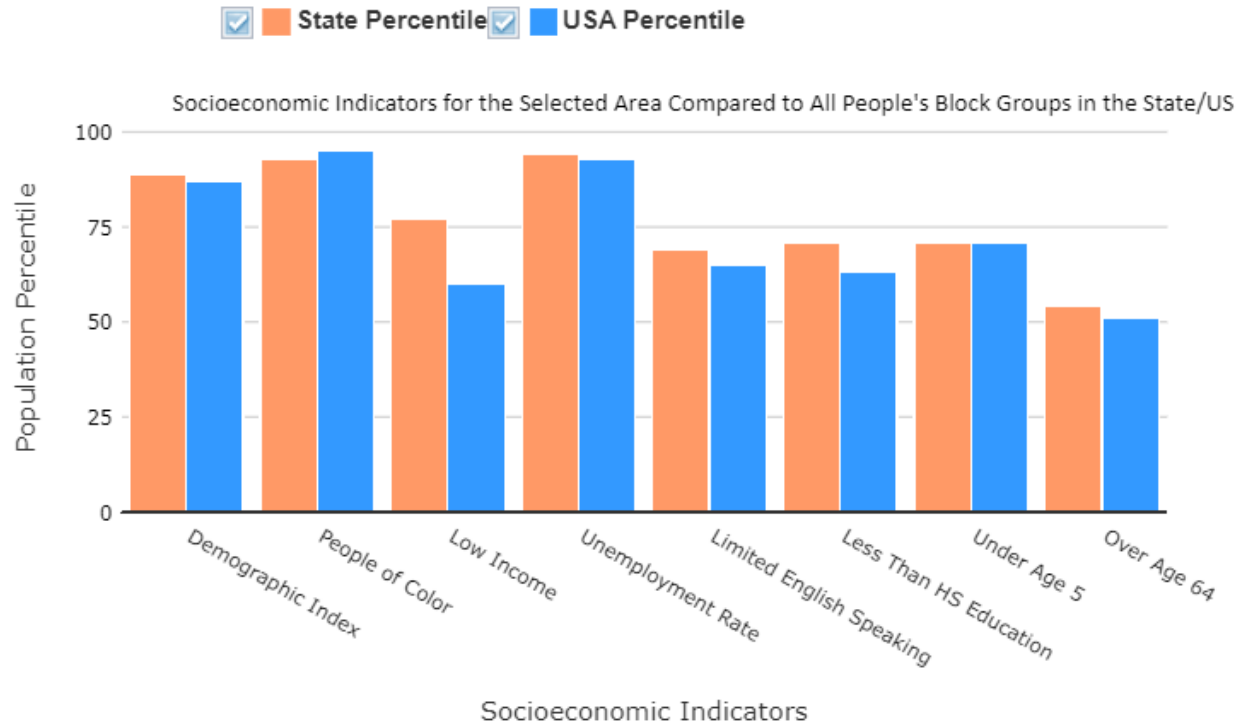
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Selected Variables	Percentile in State	Percentile in USA
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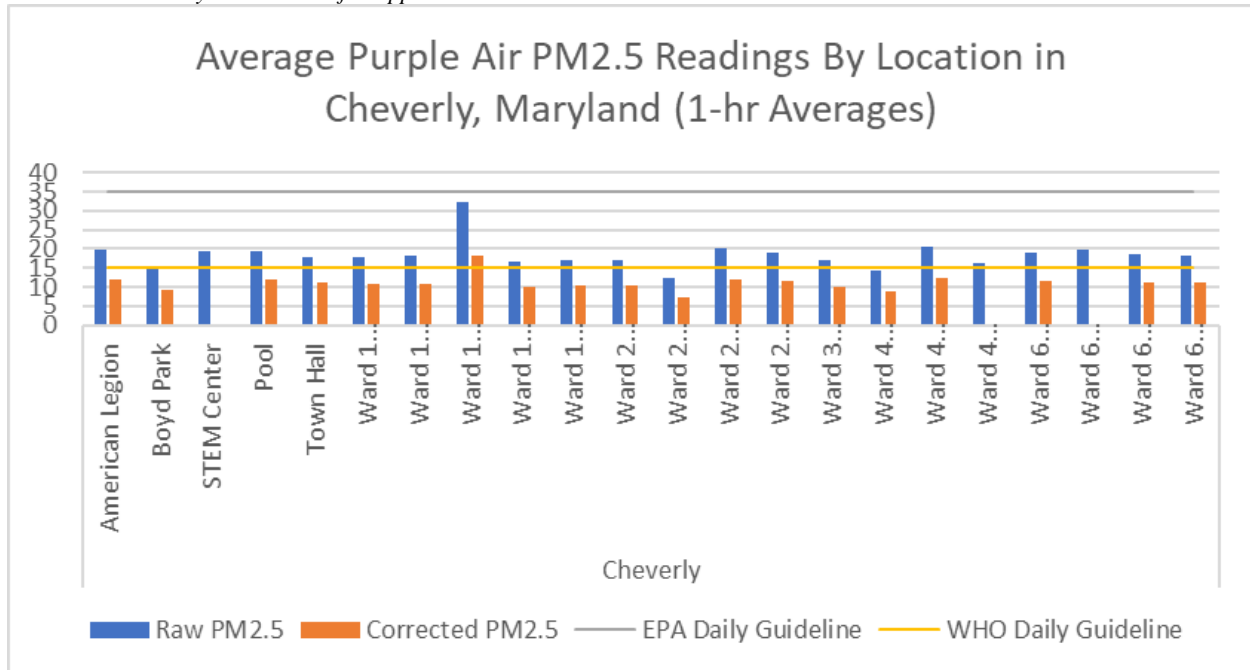
EJ Index for the Selected Area Compared to All People's Blockgroups in the State/US



**Figure 8** presents socioeconomic values. 99% are residents of color, placing the area in the 93rd percentile compared to the state and 95th percentile nationally. 34% are low income, placing the area in the 77th percentile statewide and 60th percentile nationwide. 16% are unemployed and 12% lack a high school diploma, placing in the 94th and 71st percentile statewide, respectively, and 93rd and 71st percentile nationwide.



Interestingly, the PM<sub>2.5</sub> levels in EPA EJSCREEN (8.47 µg/m<sup>3</sup>) severely underestimate actual exposure, which a hyperlocal air monitoring project determined to be 11.1 µg/m<sup>3</sup>. **Figure 9** reveals PM<sub>2.5</sub> readings at 22 Cheverly sites. Many raw PM<sub>2.5</sub> levels exceed the WHO daily standard and are well over EPA EJSCREEN's reading of 8.47 µg/m<sup>3</sup>, presenting a need to reduce environmental burdens rather than introduce yet another pathogenic facility.



I request the board to refer to the definition of environmental racism coined by Dr. Benjamin Chavis, referring to “the intentional selection of communities of color for wastes disposal sites and polluting industrial facilities, essentially condemning them to contamination”.<sup>1</sup>

Environmental racism is linked to disproportionate impacts of transportation projects, known as “transportation racism”.<sup>2</sup> Plainly, the proposed project will worsen the pollution burden residents face and contribute towards environmental racism.

Overall, the Cheverly study evidenced concerns that an increase in industrial activity will increase pollutant emissions to the atmosphere, and revealed spatial variations in PM2.5 levels in Cheverly that provide baseline information on residential exposure to PM2.5 associated with facilities and other local sources.

I would like to conclude with a definition of an emerging term in the environmental justice space: “environmental racism.” Studies have linked environmental racism to disproportionate impacts of transportation projects, also known as “transportation racism” (Bullard et al., 2004). Plainly, the proposed project on Claybrick Rd will exacerbate the pollution burden nearby residents face and contribute towards environmental racism. I request you to refer to the definition coined by Dr. Benjamin Chavis, then director of the United Church of Christ's Commission for Racial Justice (CRJ), in response to the 1982 protests in Warren County, North Carolina (Mank, 2007). Environmental racism refers to “the intentional selection of communities





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of color for wastes disposal sites and polluting industrial facilities, essentially condemning them to contamination” .

## References

1. Mank, B. (2007). Title VI and the Warren County protests. *Golden Gate U. Envtl. LJ*, 1, 73.
2. Bullard, R. D., Johnson, G. S., & Torres, A. O. (Eds.). (2004). *Highway robbery: Transportation racism & new routes to equity*. South End Press.

Copy of Comments Made by Tad Aburn  
MWAQC Meeting  
December 7, 2022

[tadaburn@gmail.com](mailto:tadaburn@gmail.com)  
(443) 829-3652

Mr. Chairman, MWAQC members, thank you for providing the opportunity to provide public comment today.

My comments are on the emerging issue of systemic, government supported, environmental racism.

My name is Tad Aburn. In October, I was the Chair of MWAQC TAC. For the past 10 years I was the MDE air director and an MWAQC member. I am now retired and commenting today as a concerned citizen.

The COG staff has tried to frame this issue as a “local” issue. It is not. The issue I am commenting on, environmental racism, is a widespread regional problem taking place in many areas across the region. The problem is driven by outdated regional air quality, transportation and land-use and zoning policies that create air pollution “hot spots” in many low income communities of color. State and community-based monitoring shows that, although air pollution in general has improved across the region, the air quality in many communities of color remains unhealthy.

As you meet today, the District of Columbia is planning to build a large, dirty bus maintenance facility in a community of color located in Prince George's County, Maryland. The facility will help the region transition to electric buses and provide environmental benefits to the primarily white residents of the region. It is unfortunately being done at the expense of a small, defenseless community of color. This is classic government supported racism.

The proposed facility to be built on Claybrick Road, will result in significant air pollution during construction and operation that will be breathed by the residents. Emissions from the new facility include carcinogenic diesel particulate and benzene and airborne dust containing deadly heavy metals and asbestos. Because of ill-informed zoning and land-use decisions, this community is already overburdened by many dirty facilities.

Not one person on MWAQC would want to live next to the Claybrick Road facility. Why is it OK for a community of color to breathe unhealthy air?

MWAQC has already been asked to update policies on the issue of regional projects that continue a legacy of dumping dirty businesses on communities of color. This is what is happening on Claybrick Road. There are many other situations similar to this, including one in Ivy City, DC.

In closing, environmental racism is one of the most important issues that MWAQC must address. I urge you to show real leadership, stop the Claybrick Road project and begin to update older zoning and land policies that are now well recognized to enable and promote environmental racism.

I would urge you to discuss this issue today or to at least ask the staff to prepare a region-wide briefing on this issue for your next meeting.

A copy of these comments and a letter containing more detailed information has also been submitted.

Tad Aburn  
39724 East Sun Drive, Unit 213  
Fenwick Island, DE 19944  
tadaburn@gmail.com  
(443) 829-3652

December 5, 2022

Takis Karantonis, Chair  
MWAQC Members  
Metropolitan Washington Air Quality Committee (MWAQC)  
777 North Capitol St. N.E.  
Suite 300,  
Washington, DC 20002

Re: Systemic Environmental Racism Linked to MWAQC Policies

Chairman Karantonis and MWAQC members:

I have asked the COG staff to distribute this letter on November 5, 2022. Thank you for providing the opportunity to provide short public comments for consideration at the December 7, 2022 MWAQC meeting.

I am writing today in advance of the public comment opportunity to provide a more detailed letter on the critical issue now surfacing in the Washington, DC metropolitan area that I will be commenting on ... systemic, government supported, environmental racism.

My name is Tad Aburn. Last month I was the Chair of the MWAQC Technical Advisory Committee. For almost 20 years I was the director of the air pollution program in Maryland. I was also a member of MWAQC for about the past 10 years. I am now retired and commenting today as a concerned, well-informed citizen.

The MWCOC staff appears to be framing this issue as a "local" issue. It is not ... it is a critical region-wide issue. The issue I am submitting comments on is a widespread regional problem where air quality, transportation and land use policies in the Washington region have created air pollution and high environmental risk "hotspots" in low income communities, often communities of color. Although regional air quality and land use policies were not intended to create systemic, environmental racism, they

clearly have. There are examples all over the Washington metropolitan area. I believe that MWAQC, should not be satisfied with the general progress the region has made with ground level ozone while these very high risk air pollution hotspots, in communities of color, exist ... and continue to get worse. Many of these overburdened communities have or are planning to install community based monitoring programs. Where this has been done, it is clear ... the air pollution hotspots are real.

There is a classic example of this kind of government supported environmental racism taking place right now. As you meet on the 7th, the District of Columbia is planning to build a very large, very dirty bus maintenance and training facility next to and directly upwind of a small community of color located in the Cheverly and Seat Pleasant area of Prince George's County, Maryland. The facility will eventually help the region transition to electric buses and will provide significant environmental benefits to the residents of the region ... the primarily white residents of the region. The problem is that it is being done at the expense of a small, somewhat defenseless community of color. To repeat ... this is a classic case of government supported racial injustice ... specifically environmental racism.

The proposed facility to be built on Claybrick Road, will result in significant air pollution during construction and operation that will be breathed by the residents living in the area. A few of the specific air pollutants that will be released as a result of the new facility include cancer causing pollutants like diesel particulate and benzene and airborne dust which is likely to contain deadly heavy metals and asbestos. To make things worse, because of ill-informed zoning and land-use decisions, this community of color is already overburdened by over 30 similar dirty facilities again located next to and directly upwind of where the residents breathe the air.

Simply stated, not one person on MWAQC would want to live next to or near the new DC Claybrick Road facility or the other dirty businesses located in the area. I ask you ... why is it OK for the residents in a community of color to breathe unhealthy air?

I recognize that this is a very difficult and sensitive issue. During the October MWAQC TAC meeting, a motion to get an update from the District on the proposed Claybrick Road Project was made. The motion did not pass as MWCOG staff said that several MWAQC TAC members argued that environmental justice and environmental racism are not issues that MWAQC plans to address. I find that difficult to believe.

I know that MWAQC leadership was asked by the TAC Chair to clarify MWAQC's policy on environmental racism and the emerging issue of regional projects that continue a legacy of dumping dirty businesses on communities of color. This is what is now

happening because of the District's proposed Claybrick Road facility. According to the MWCOG staff there are multiple other emerging situations similar to the Claybrick Road project, including one high profile, environmentally racist project in the Ivy City community of color in the District of Columbia.

In closing, racial equity and environmental racism will be one of the most important issues that MWAQC will need to address over the next few years. I believe that MWAQC should do whatever it can to stop the Claybrick Road project and immediately begin to work regionally to change the way that air pollution and environmental justice are explicitly considered as part of the region's air pollution plan. This will require the region to rethink the way zoning and land use decisions are made. Unfortunately, it is now well recognized that these outdated policies not only enable, but actually promote environmental racism.

Please do not hesitate to contact me. I look forward to the leadership I expect you to show on this very difficult issue. I feel strongly that MWAQC believes that issues like the air pollution hotspots being created because of the the Claybrick Road project and the outdated land use and zoning policies that are driving these situations are clearly issues that MWAQC needs to address.

I have attached a recent comment letter sent to the MWCOG Climate, Energy and Environment Policy Committee (CEEPC) that provides additional information and attaches comment letters from Dr. Sacoby Wilson's University of Maryland environmental justice center. There is also additional information on this issue in the public comment summary section of the MWCOG TPB web page for their recent 11/16/22 meeting.

Respectfully,

*George S. Aburn Jr*

Tad Aburn  
[tadaburn@gmail.com](mailto:tadaburn@gmail.com)  
(443) 829-3652

ccs: (to be distributed by MWCOG staff):  
Christian Dorsey, Chair MWCOG BOD  
Koran Saines, Chair, CEEPC  
Pamel Sebesky, Chair, TPB  
Dr. Sacoby Wilson, UMCP CEEJH

Kelly Crawford, Air Director, DC DOEE

Attachments

Tad Aburn  
39724 East Sun Drive, Unit 213  
Fenwick Island, DE 19944  
tadaburn@gmail.com  
(443) 829-3652

November 14, 2022

Koran Saines  
Chair, MWCOG Climate, Energy & Environment Policy Committee (CEEPC)  
Mary Cheh  
Vice-Chair CEEPC  
777 North Capitol St. N.E.  
Suite 300  
Washington, DC 20002

Chairman Saines and Vice Chair Cheh:

Thank you for providing the opportunity to submit this letter of concern for consideration at the November 16, 2022 MWCOG CEEPC meeting. If possible, I would like to make a short virtual public comment at the 11/16 meeting.

I am writing today to comment on a critical issue now surfacing in the Washington, DC metropolitan area ... racial inequity.

My name is Tad Aburn. Last month I was the Chair of the MWAQC Technical Advisory Committee. For the past 10 years I was the director of the air pollution program in Maryland and a member of MWAQC. I am now retired and commenting today as a concerned, well-informed citizen.

As you know, climate justice, environmental justice and energy justice are amongst the highest priorities for Committees like CEEPC. MWCOG and CEEPC are nationally recognized leaders on difficult issues like these. My letter today urges you to continue to demonstrate strong leadership as you transform the regional MWCOG policies on energy, the environment and climate change to ensure racial equity.

As you meet on the 16th, the District of Columbia is planning to build a very large, very dirty bus maintenance and training facility next to and directly upwind of a small community of color located in the Cheverly and Seat Pleasant area of Prince George's County, Maryland. The facility will eventually help the region transition to electric buses



and will provide significant environmental benefits to the residents of the region ... the primarily white residents of the region. Bus and vehicle electrification are part of the MWCOG region's climate change, energy and environmental plans. The problem is that it is being done at the expense of a small, somewhat defenseless community of color. This is a classic case of government supported racial injustice ... specifically environmental racism.

The proposed facility to be built on Claybrick Road, will result in significant air pollution during construction and operation that will be breathed by the residents living in the area. A few of the specific air pollutants that will be released as a result of the new facility include cancer causing pollutants like diesel particulate and benzene and airborne dust which is likely to contain deadly heavy metals and asbestos. To make things worse, because of ill-informed zoning and land-use decisions, this community of color is already overburdened by over 30 similar dirty facilities again located next to and directly upwind of where the residents breathe the air.

Simply stated, not one person on CEEPC would want to live next to or near the new DC Claybrick Road facility or the other dirty businesses located in the area. I ask you ... why is it OK for the residents in a community of color to breathe that unhealthy air?

I recognize that this is a very difficult and sensitive issue. I am bringing it to the MWCOG Board because the Board and the region, in general, have historically demonstrated real national leadership on how to address this kind of difficult issue. As the past Chair of MWAQC TAC, I know that your MWAQC leadership has been asked to clarify MWAQC's policy on environmental racism and the emerging issue of regional projects that continue a legacy of dumping dirty businesses on communities of color. This is what is now happening because of the District's proposed Claybrick Road facility. According to the COG staff there are multiple other emerging situations similar to the Claybrick Road project, including one high profile project in the Ivy City community of color in the District of Columbia.

In closing, racial equity and energy, environmental and transportation racism will be some of the most important issues that CEEPC will need to address over the next 10 years. I urge you to show real leadership, stop the Claybrick Road project and begin to work regionally, through MWCOG and TPB to change the way that zoning and land use decisions are made. Unfortunately, it is now well recognized that these outdated policies not only enable, but actually promote environmental racism.

I am attaching three earlier letters on this topic. Attachment 1 is my letter to the COG Board of Directors. Attachment 2 is a November 9, 2022 letter from the University of

Maryland's Community Engagement, Environmental Justice and Health (CEEJH) Center run by Dr. Sacoby Wilson. Attachment 3 is a November 9, 2022 CEEJH letter to MWAQC. Please do not hesitate to contact me. I look forward to the leadership I expect you to show on this very difficult issue.

*George S. Aburn Jr.*

Tad Aburn  
Concerned Citizen  
[tadaburn@gmail.com](mailto:tadaburn@gmail.com)  
(443) 829-3652

Cc: CEEPC members  
Ted Dernoga, Prince George's County Council and MWAQC member  
Tara Failey, Chair, MWCOG AQPAC  
Era Pandya, Vice Chair, MWCOG AQPAC  
Kelly Crawford, Air Director, DC DOEE

Tad Aburn  
39724 East Sun Drive, Unit 213  
Fenwick Island, DE 19944  
tadaburn@gmail.com  
(443) 829-3652

## ATTACHMENT 1

November 7, 2022  
Christain Dorsey  
Chair, MWCOG Board of Directors  
777 North Capitol St. N.E.  
Suite 300  
Washington, DC 20002

Chairman Dorsey:

Thank you for providing the opportunity to submit comments for consideration at the November 9, 2022 MWCOG Board meeting.

I am writing today to comment on a critical issue now surfacing in the Washington, DC metropolitan area ... racial inequity.

My name is Tad Aburn. Last month I was the Chair of the MWAQC Technical Advisory Committee. For almost 20 years I was the director of the air pollution program in Maryland. I am now retired and commenting today as a concerned, well-informed citizen.

As you meet today, the District of Columbia is planning to build a very large, very dirty bus maintenance and training facility next to and directly upwind of a small community of color located in the Cheverly and Seat Pleasant area of Prince George's County, Maryland. The facility will eventually help the region transition to electric buses and will provide significant environmental benefits to the residents of the region ... the primarily white residents of the region. The problem is that it is being done at the expense of a small, somewhat defenseless community of color. This is a classic case of government supported racial injustice ... specifically environmental racism.

The proposed facility to be built on Claybrick Road, will result in significant air pollution during construction and operation that will be breathed by the residents living in the area. A few of the specific air pollutants that will be released as a result of the new facility include cancer causing pollutants like diesel particulate and benzene and airborne dust which is likely to contain deadly heavy metals and asbestos. To make

things worse, because of ill-informed zoning and land-use decisions, this community of color is already overburdened by over 30 similar dirty facilities again located next to and directly upwind of where the residents breathe the air.

Simply stated, not one person on the MWCOG Board would want to live next to or near the new DC Claybrick Road facility or the other dirty businesses located in the area. I ask you ... why is it OK for the residents in a community of color to breathe that unhealthy air?

I recognize that this is a very difficult and sensitive issue. I am bringing it to the MWCOG Board because the Board and the region, in general, have historically demonstrated real national leadership on how to address this kind of difficult issue. As the past Chair of MWAQC TAC, I know that your MWAQC leadership has been asked to clarify MWAQC's policy on environmental racism and the emerging issue of regional projects that continue a legacy of dumping dirty businesses on communities of color. This is what is now happening because of the District's proposed Claybrick Road facility. According to the COG staff there are multiple other emerging situations similar to the Claybrick Road project, including one high profile project in the Ivy City community of color in the District of Columbia.

In closing, racial equity and environmental racism will be one of the most important issues that MWCOG will need to address over the next 10 years. I urge you to show real leadership, stop the Claybrick Road project and begin to work regionally to change the way that zoning and land use decisions are made. Unfortunately, it is now well recognized that these outdated policies not only enable, but actually promote environmental racism.

Please do not hesitate to contact me. I look forward to the leadership I expect you to show on this very difficult issue.

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[tadaburn@gmail.com](mailto:tadaburn@gmail.com)  
(443) 829-3652

Cc: Kate Stewart, MWCOG BOD Vice Chair  
Charles Allen, MWCOG BOD, Second Vice Chair  
Ted Dernoga, Prince George's County Council and MWAQC member

Koran Saines, Chair MWCOG CEEPC  
Tara Failey, Chair, MWCOG AQPAC  
Roger Thunell, Chair MWAQC TAC  
Kelly Crawford, Air Director, DC DOEE



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SCHOOL OF PUBLIC HEALTH  
*Maryland Institute for Applied and Environmental Health*

Sacoby Wilson, PhD, MS  
Professor  
2234 School of Public Health Bldg  
College Park, Maryland 20742-2611  
301.405.3136 TEL, 301.405.8397 FAX

## Attachment 2

November 9, 2022

Christain Dorsey  
Chair, MWCOG Board of Directors  
777 North Capitol St. N.E.  
Suite 300  
Washington, DC 20002

Thank you for providing the opportunity to submit comments for consideration at the November 9, 2022 Board meeting. I am writing today to comment on the proposed maintenance yard for the DC Circulator to be located at 1201 Claybrick Road in Cheverly, Maryland. My name is Dr. Sacoby M. Wilson, Full Professor at the Maryland Institute for Applied Environmental Health, at the University of Maryland, School of Public Health. I am also the Director of the Center for Community Engagement, Environmental Justice, and Health. For the last 20 years, I have worked as an environmental health scientist in the areas of exposure science, environmental justice, environmental health disparities, community-based participatory research, water quality analysis, air pollution studies, built environment, industrial animal production, climate change, community resiliency, and sustainability. I work primarily in partnership with community-based organizations to study and address environmental justice and health issues and translate research to action.

As you meet today, the District of Columbia is planning to build a dirty bus maintenance and training facility next to and directly upwind of Cheverly and Seat Pleasant in Prince George's County, Maryland. These are communities of color who have long faced pollution burdens associated with environmental pathogen, which this proposed project will only contribute negatively to.

### **EPA EJSCREEN Report**

Environmental justice screening and mapping (EJSM) tools are a prime example of a screening mechanism of cumulative impacts. An example of this is EPA EJSCREEN. **Figure 1** presents an EJSCREEN analysis of the 1-mile buffer ring directly surrounding the coordinates of the proposed project, which do not differ from the above mentioned analysis (EPA, 2021). Observed are elevated percentiles of diesel particulate matter, air toxics cancer risk, and respiratory hazard, relative to the rest of Maryland and the United States. Therefore, residents already face environmental and health burdens, presenting a baseline risk assessment for the community.



# UNIVERSITY OF MARYLAND

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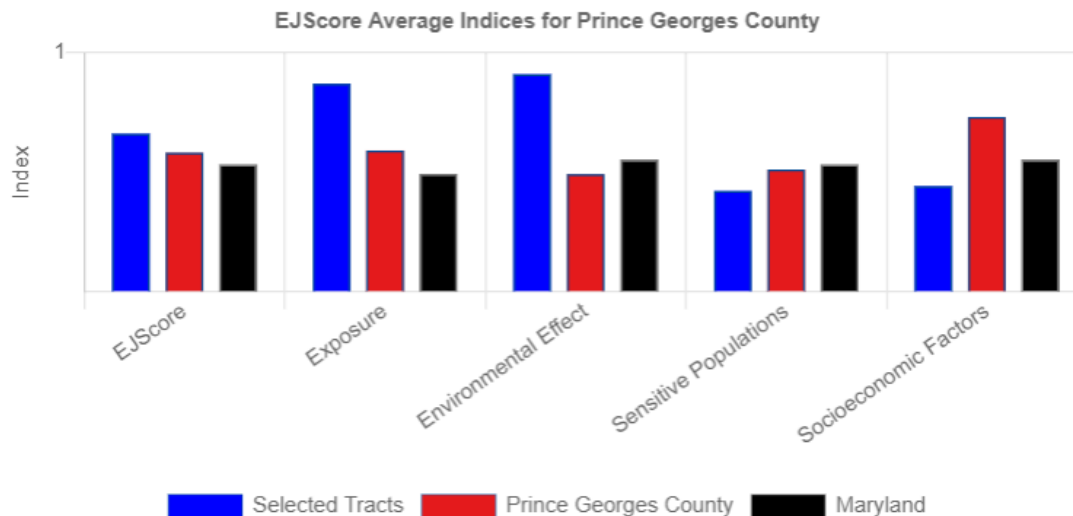
**EJScreen Report (Version 2.1)**  
1 mile Ring Centered at 38.907127,-76.907086  
MARYLAND, EPA Region 3  
Approximate Population: 14,204  
Input Area (sq. miles): 3.14

Selected Variables	Percentile in State	Percentile in USA
<b>Environmental Justice Indexes</b>		
EJ Index for Particulate Matter 2.5	76	78
EJ Index for Ozone	48	84
EJ Index for Diesel Particulate Matter*	89	92
EJ Index for Air Toxics Cancer Risk*	76	88
EJ Index for Air Toxics Respiratory HI*	77	89
EJ Index for Traffic Proximity	75	87
EJ Index for Lead Paint	85	90
EJ Index for Superfund Proximity	87	91
EJ Index for RMP Facility Proximity	94	94
EJ Index for Hazardous Waste Proximity	77	93
EJ Index for Underground Storage Tanks	83	84
EJ Index for Wastewater Discharge	10	5

EJ Index for the Selected Area Compared to All People's Backgrounds in the State/US

**Figure 1:** EJSCREEN analysis of the 1-mile buffer ring surrounding the coordinates of the proposed project.

The Maryland Environmental Justice Screen Tool (MD EJSCREEN) is a state-specific EJS tool that utilizes local data, is customized to local community concerns, and is useful for state, county-level, and municipal policymaking (Driver et al., 2019). It combined pollution burden and population characteristics to create an EJ Index. The overall MD EJSCREEN Index for Cheverly is 0.66, indicating that the town is an area of high environmental justice concern, when compared to the rest of Prince George's County (EJ Index = 0.58) and state of Maryland (EJ Index = 0.53). When assessing the individual domains, Cheverly had an extremely high exposure score (0.87) and environmental effect score (0.91), compared to county (0.59 and 0.49) and state (0.49 and 0.55) averages, respectively. Noticeably, the scores for sensitive populations and SES were low (0.42 and 0.44, respectively), compared to the County (0.51 and 0.73) and state (0.53 and 0.55) averages. The full breakdown of EJ Indices are revealed in **Figure 2**.

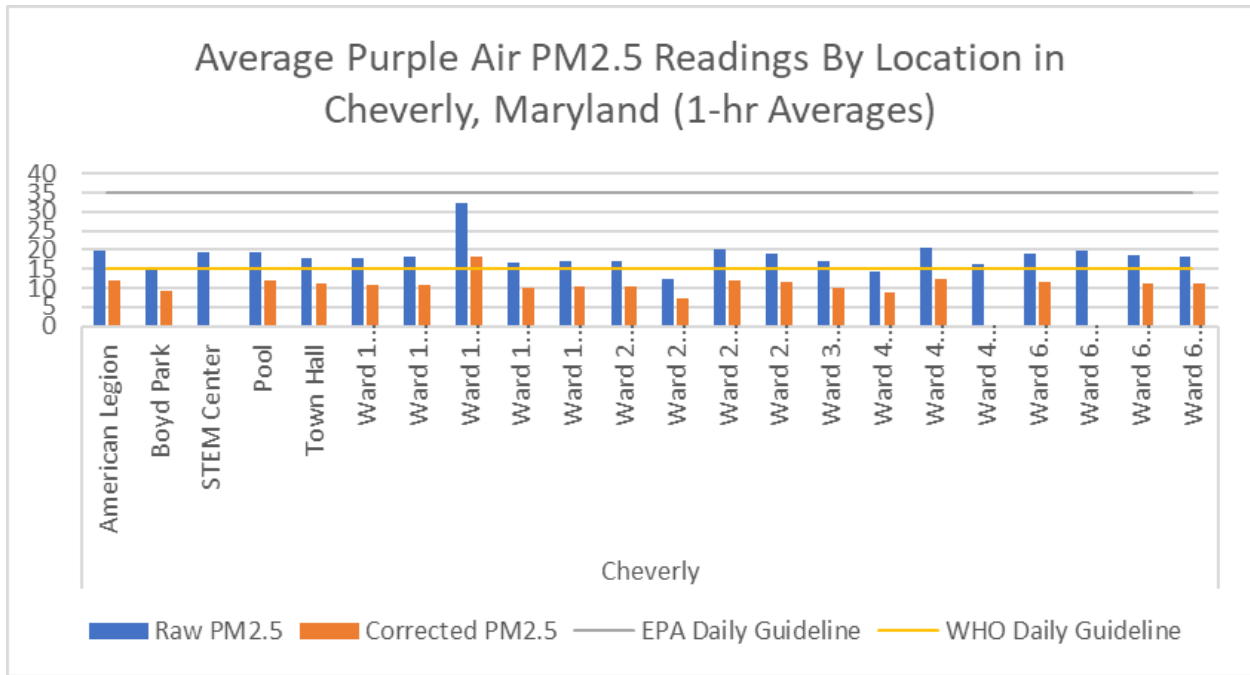


**Figure 2:** MD EJSCREEN Indices by domain for Cheverly, Maryland compared to Prince George's County, Maryland and the State of Maryland



### Air Quality Monitoring Results for Cheverly, Maryland

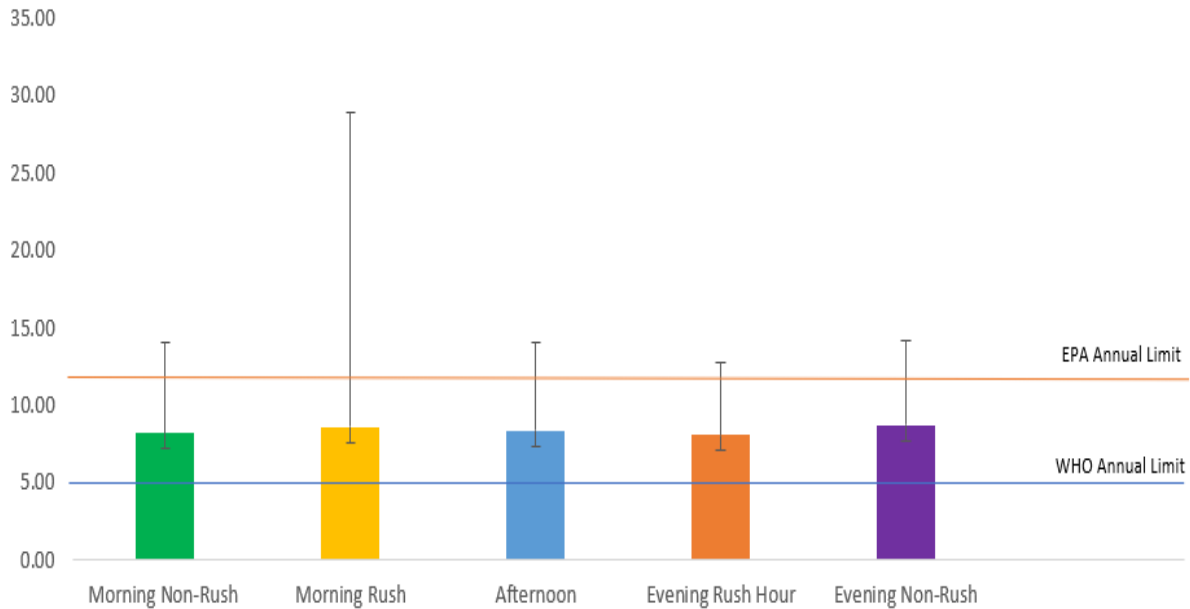
CEEJH has performed a comprehensive EJSCREEN analysis for the greater Cheverly, Maryland region as part of the hyperlocal Purple Air Monitoring Project that began in 2019, which is impacted by the proposed project on Claybrick Rd. This is an ongoing partnership, whose integral partners include: CEEJH, the Maryland Department of the Environment (MDE), and the Town of Cheverly (MDE, 2021). This analysis has been presented at various venues, from local community events to major regional conferences such as the University of Maryland’s Annual Symposium on Environmental Justice and Health Disparities. Purple Air monitors (N = 23) were placed throughout Cheverly, including within 0.25 km of the proposed site, to assess concerns over air pollution related to local industrial activities and traffic. Moreover, we compared community-level data with PM2.5 measurements collected at MDE reference sites to assess whether Cheverly levels were consistently higher. PM2.5 levels of our hyperlocal network were generally higher than these national and regional trends. The overall averages (both raw and corrected values) for the Purple Air monitors that met our quality assurance protocols are shown in **Figure 3**.



**Figure 3:** Comparison of Average Purple Air Readings to EPA (35 ug/m3) and WHO (15 ug/m3) Daily Guidelines

Additionally, the diurnal analysis found that the rush hours had statistically significantly higher PM2.5 levels than off-peak hours (**Figure 4**).





**Figure 4.** Diurnal investigation of PM2.5 levels, divided into 5 time bins: morning non-rush (1:00-5:00am), morning rush (6:00-11:00 am), afternoon off-peak (12:00-2:00pm), evening rush (3:00-8:00pm), and evening off-peak (9:00pm-12:00am).

Overall, the Cheverly study evidenced concerns that an increase in industrial activity will increase pollutant emissions to the atmosphere, and revealed spatial variations in PM2.5 levels in Cheverly that provide baseline information on residential exposure to PM2.5 associated with facilities and other local sources.

I would like to conclude with a definition of an emerging term in the environmental justice space: “environmental racism.” Studies have linked environmental racism to disproportionate impacts of transportation projects, also known as “transportation racism” (Bullard et al., 2004). Plainly, the proposed project on Claybrick Rd will exacerbate the pollution burden nearby residents face and contribute towards environmental racism. I request you to refer to the definition coined by Dr. Benjamin Chavis, then director of the United Church of Christ's Commission for Racial Justice (CRJ), in response to the 1982 protests in Warren County, North Carolina (Mank, 2007). Environmental racism refers to “the intentional selection of communities of color for wastes disposal sites and polluting industrial facilities, essentially condemning them to contamination” (CSBSJU, n.d).



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## ATTACHMENT 3

As Director of the Center for Community Engagement, Environmental Justice, and Health (CEEJH) located within the Maryland Institute for Applied Environmental Health at the University of Maryland School of Public Health, I, Dr. Sacoby Wilson, I am reaching out regarding the proposed maintenance yard for the DC Circulator to be located at 1201 Claybrook Road in Cheverly, Maryland.

Federal guidance from the EPA and DOT outlines the requirements of meaningful involvement and fair treatment throughout the regulatory decision making process. Meaningful involvement means that: (1) potentially affected community residents have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health; (2) the public contribution can influence the regulatory agency's decision; (3) the concerns of all participants involved will be considered in the decision making process; and (4) the decision makers seek out and facilitate the involvement of those potentially affected. Fair treatment requires no group of people, including a racial, ethnic or a socioeconomic group, to bear a disproportionate share of the negative environmental consequences from industrial, municipal and commercial operations or the execution of federal, state, local and tribal programs and policies (EPA, 2015) (Department of Transportation, 2017).

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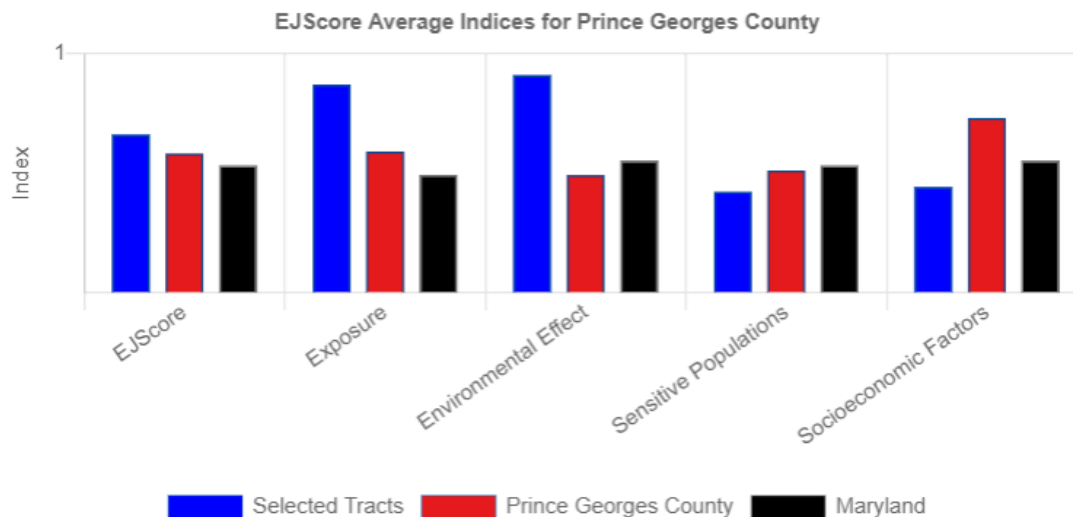
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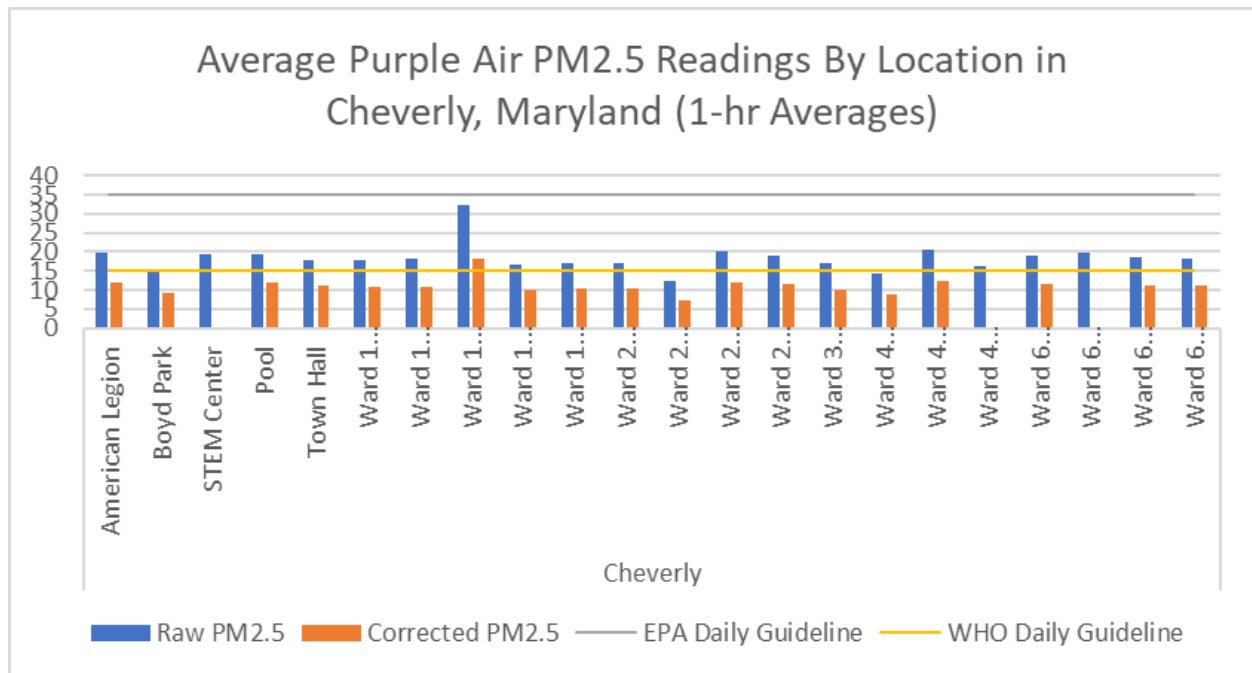
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Tad Aburn  
39724 East Sun Drive, Unit 213  
Fenwick Island, DE 19944  
tadaburn@gmail.com  
(443) 829-3652

## ATTACHMENT 4

November 14, 2022

Pamela Sebesky  
Chair, MWCOG Transportation Planning Board  
777 North Capitol St. N.E.  
Suite 300  
Washington, DC 20002

RE: More Detailed Letter of Concern for 11/16/22 TPB Meeting

Madame Chairman, Board members, thank you for providing the opportunity to provide public comment for the November 16, 2022 TPB meeting. This letter is the letter containing more detailed information mentioned in my short written public comments for the 11/16/22 TPB meeting.

My comments are on a critical issue now surfacing in the Washington, DC metropolitan area ... racial inequity and transportation and environmental racism.

My name is Tad Aburn. Last month I was the Chair of the MWAQC Technical Advisory Committee. I was an MWAQC member for over 10 years. For almost 20 years I was the director of the air pollution program in Maryland. I am now retired and commenting today as a concerned, well-informed citizen.

The TPB has a long history of being a national leader on difficult issues like transportation racism. Your approach for addressing this issue in designing the metro is internationally recognized. I am asking you to continue to demonstrate your leadership as the issue of racial equity moves closer to the top of the transportation planning priority list.

As you meet today, the District of Columbia is planning to build a very large, very dirty bus maintenance and training facility next to and directly upwind of a small community of color located in the Cheverly and Seat Pleasant area of Prince George's County, Maryland. The facility will eventually help the region transition to electric buses and will provide significant environmental benefits to the residents of the region ... the primarily

white residents of the region. Bus and vehicle electrification is a critical element of the region's transportation plan. The problem is that it is being done at the expense of a small, somewhat defenseless community of color. This is a classic case of government supported racial injustice ... specifically environmental racism.

The proposed facility to be built on Claybrick Road, will result in significant air pollution during construction and operation that will be breathed by the residents living in the area. A few of the specific air pollutants that will be released as a result of the new facility include cancer causing pollutants like diesel particulate and benzene and airborne dust which is likely to contain deadly heavy metals and asbestos. To make things worse, because of ill-informed zoning and land-use decisions, this community of color is already overburdened by over 30 similar dirty facilities again located next to and directly upwind of where the residents breathe the air.

Simply stated, not one person on TPB would want to live next to or near the new DC Claybrick Road facility or the other dirty businesses located in the area. I ask you ... why is it OK for the residents in a community of color to breathe that unhealthy air?

I recognize that this is a very difficult and sensitive issue. I am bringing it to the TPB because the Board and the region, in general, have historically demonstrated real national leadership on how to address this kind of difficult issue. As the past Chair of MWAQC TAC, I know that your MWAQC leadership has been asked to clarify MWAQC's policy on environmental racism and the emerging issue of regional projects that continue a legacy of dumping dirty businesses on communities of color. This is what is now happening because of the District's proposed Claybrick Road facility. According to the COG staff there are multiple other emerging situations similar to the Claybrick Road project, including one high profile project in the Ivy City community of color in the District of Columbia.

I am attaching three earlier letters on this topic. Attachment 1 is my letter to the COG Board of Directors. Attachment 2 is a November 9, 2022 letter from the University of Maryland's Community Engagement, Environmental Justice and Health (CEEJH) Center run by Dr. Sacoby Wilson. Attachment 3 is a November 9, 2022 CEEJH letter to MWAQC.

In closing, racial equity and environmental racism will be one of the most important issues that MWCOCG will need to address over the next 10 years. I urge you to show real leadership, stop the Claybrick Road project and begin to work regionally to change the way that zoning and land use decisions are made. Unfortunately, it is now well

recognized that these outdated policies not only enable, but actually promote environmental racism.

Please do not hesitate to contact me. I look forward to the leadership I expect you to show on this very difficult issue.

*George S. Aburn Jr.*

Tad Aburn  
Concerned Citizen  
[tadaburn@gmail.com](mailto:tadaburn@gmail.com)  
(443) 829-3652

Cc: TPB Members  
Ted Dernoga, Prince George's County Council and MWAQC member  
Kelly Crawford, Air Director, DC DOEE