

Tad Aburn
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**Copy of Public Comments to be made by Tad Aburn at the
March 20, 2023 ACPAC Meeting**

Madame Chairman ... ACPAC members:

Thank you for providing me with a 5 minute slot on your March 20th agenda to provide public comment.

My name is Tad Aburn. Last year 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. During my time at the Maryland Department of the Environment, I was also the lead staff to the State's Climate Change Commission and the Commission's Mitigation Working Group. I am now retired and commenting today as a member of the general public.

Other pieces of information about me and my desire (some would argue my somewhat fanatical desire) to push environmental progress ... I am doing volunteer work for several environmental justice communities in Maryland ... I am a huge believer in the power of an engaged public ... I have considerable experience working with public advisory groups (For the last 15 years of my career at MDE, I was the key advisor to the Chair of the Maryland Air Quality Control Advisory Council, one of the Countries most effective public advisory groups).

I am concerned that ACPAC is not addressing critical environmental issues facing the Metropolitan Washington region. Examples of key environmental issues that need to be addressed include:

- The need for the region to strengthen its climate change goals to be consistent with the current science and goals set in other leadership areas. 60 percent reduction by 2030 and net zero emissions by 2045 ... not 50 and 80 percent.

- The need to ensure that the routine (usually annual) process for ensuring that new regional transportation plans are consistent with regional air quality goals also include climate change goals, not just air pollution goals. This process called “transportation conformity” currently only looks at air pollutants, not greenhouse gases ... even though the data for greenhouse gases is available as part of the modeling process used.
- The need to develop a plan to address the inequitable exposures to air pollution in environmental justice communities. These communities are often communities of color. The data is very clear that these inequities exist and that there are “air pollution hot-spots” in and around communities of color.
- The need to ensure that critical laws and policies designed to reduce exposure and risk from air pollutants and to address climate change are actually being implemented.

In your package for the March 20, 2023 ACPAC Meeting you should have my March 15, 2023 letter to ACPAC and several other recent letters to TPB, MWAQC and other Committees at MWCOG. These letters provide additional information on these environmental issues that I believe ACPAC needs to discuss and hopefully provide advice to MWAQC, CEEPC and the MWCOG Board on.

I am concerned, for reasons that I do not fully understand, that ACPAC is not addressing substantive environmental issues. Having participated in the last few meetings, there have been virtually no substantive items included on the Committee’s agenda and no substantive discussion of real environmental problems that need to be resolved. As the regions “voice of the public ” on environmental issues, I urge you to take advantage of the advisory role you have to push the policy committees to be true leaders on air quality and climate change issues and the policies needed to address them.

So why am I pushing on the MWCOG process? MWCOG is recognized nationally for being a leader on these kinds of issues. That said, the regional process needs an effective public advisory committee to continue to be on the leading edge of environmental policy. As a local laboratory of environmental innovation, the MWCOG region can actually drive national policy. I urge you to take your responsibility very seriously ... It is a critical time for climate change, energy and environmental policy.

In closing, I would be happy to discuss all of these issues, why the data that shows that these issues are critical and my thoughts on how these issues should be addressed, as

part of future ACPAC meetings or in smaller meetings with ACPAC leadership and interested ACPAC members. Several examples of future discussions that I would be happy to volunteer my time on include:

- I could work with COG staff to organize a session for ACPAC to hear from the real people who breathe the very unhealthy air in communities of color ... air that is much dirtier than the air that you and I breathe. This session could include a discussion of policies needed to correct this historical, gross and embarrassing oversight.
- Working with COG staff, a session with national policy experts and experts on the most recent science could be set up to discuss why the MWCOG region's climate change goals are no longer sufficient or appropriate and how this problem could lead to an inefficient strategy selection and implementation process ... especially for the transportation sector.
- An educational session that includes a policy discussion on why the most important clean air/transportation analysis tool under the Clean Air Act (called transportation conformity) is not currently being used to evaluate transportation strategies for greenhouse gases,
- A discussion on which critical environmental laws, regulations and policies are not being implemented or enforced and how to resolve this critical problem.

Thank you again for allowing me to provide public comments today.

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March 15, 2023

Era Pandya, Chair
Julie Kimmel, Vice-Chair
Tara Failey, Past Chair
ACPAC Committee Members
MWCOG Air and Climate Public Advisory Committee (ACPAC)
777 North Capitol St. N.E.
Suite 300,
Washington, DC 20002

Madame Chairman, other Committee leadership and ACPAC members:

I am writing to again request an opportunity to provide short public comment at your meeting next Monday, March 20, 2023. I have requested an opportunity to provide public comment at your last 3 meetings, but, according to the MWCOG staff, there was no time on the agenda for a 3-minute public comment. I was also informed that there may be time at the next meeting. Should my request again be denied, I am asking that this letter, which is addressed to the full Committee and its leadership be distributed by Friday March 16, 2023.

My name is Tad Aburn. Last year 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. During my time at the Maryland Department of the Environment, I was lead staff to the State's Climate Change Commission and the Commission's Mitigation Working Group. I am now retired and commenting today as a member of the general public.

I am concerned that ACPAC is not addressing critical environmental issues facing the Metropolitan Washington region. Examples of these issues include:

- The need for the region to strengthen its climate change goals to be consistent with the current science and goals set in other leadership areas.
- The need to ensure that the routine (usually annual) process for ensuring that new regional transportation plans are consistent with regional air quality goals also include climate change goals, not just air pollution goals. This process called “transportation conformity” currently only looks at air pollutants, not greenhouse gases ... even though the data for greenhouse gases is available as part of the modeling process used.
- The need to develop a plan to address the inequitable exposures to air pollution in environmental justice communities. These communities are often communities of color. The data is very clear that these inequities exist and that there are “air pollution hot-spots” in and around communities of color.
- The need to ensure that critical laws and policies designed to reduce exposure and risk from air pollutants and to address climate change are actually being implemented.

I have attached several recent letters to TPB, MWAQC and other Committees at MWCOG. These letters provide additional information on these environmental issues that I believe ACPAC needs to discuss and hopefully provide advice to MWAQC and CEEPC on.

I am concerned that, for reasons I do not understand, ACPAC is not addressing substantive environmental issues. Having participated in the last few meetings, there have been virtually no substantive items included on the Committees agenda and no substantive discussion of real environmental problems that need to be resolved. As the regions “voice of the public ” on environmental issues, I urge you to take advantage of the advisory role you have to push the policy committees to be true leaders on air quality and climate change issues and the policies needed to address them.

MWCOG is recognized nationally for being a leader on these issues. That said, the regional process needs an effective public advisory committee to continue to be on the leading edge of environmental policy. As a local laboratory of environmental innovation, the MWCOG region can actually drive national policy. I urge you to take your responsibility very seriously ... It is a critical time for environmental policy.

Thank you again for allowing public comments. I would be happy to discuss these comments during your next meeting or with a smaller group of ACPAC leadership.

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cc (to be distributed to MWCOG members by MWCOG staff):

Kate Stewart, Chair, MWCOG BOD

Anita Bonds, Chair, MWAQC

Tom Dernoga, Vice Chair, MWAQC

Takis Karantonis, Chair, CEEPC

Reuben Collins, Chair, TPB

Collin Burrell, DC DOEE

Dr. Sacoby Wilson, UMCP CEEJH

Leah Weis, EIP

Mike Tidwell, CCAN

Vickie Patton, EDF

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February 22, 2023

Anita Bonds, Chair, MWAQC
Kenny Boddye and Tom Dernoga, Vice Chairs, MWAQC
Members, MWAQC
777 North Capitol St. N.E.
Suite 300
Washington, DC 20002

RE: Additional Information for the 02/22/2023 MWAQC Meeting

Chairwoman Bonds, Vice Chairs Boddye and Dernoga, MWAQC members ... Thank you for the work you do and the opportunity to provide public comment during the February 22, 2023 MWAQC meeting. This letter is the letter containing the additional information mentioned in my short public comment for the 02/22/2023 MWAQC meeting.

My name is Tad Aburn. Last year 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 citizen.

My comments today, focus on two key air pollution issues that are now critical in the Washington, DC metropolitan area ... the key roles that air quality planning has in addressing environmental justice and climate change.

The attached letters listed below provide additional information on these issues. The letters are:

- A January 30, 2023 letter to ACPAC,
- A February 15, 2023 letter to TPB,
- A January 10, 2023 letter to the District of Columbia, and
- A December 30, 2023 letter to MWAQC and the COG Board.

Environmental justice and climate change will be amongst the most important issues that MWCOG and MWAQC will need to address over the next 10 years. I urge you to show real leadership and begin to address these difficult issues.

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

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Cc: MWAQC Members

Dr. Sacoby Wilson, UMCP CEEJH

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November 21, 2022

Dr. Amber A Hewitt
District of Columbia, Office of Racial Equity
John A. Wilson Building
1350 Pennsylvania Ave., N.W.
Washington D.C. 20004

Dr. Hewitt:

I am writing today to ask for your help on a critical environmental justice issue that you may not be aware of. It appears that the District of Columbia (DC) Departments of Transportation (DC DOT) and General Services (DC DGS) are moving forward with a high polluting project in Maryland that ignores the civil rights of a small community of color. Again, this appears to be a classic case of government driven environmental racism.

My name is Tad Aburn. For the past 10 years I was the director of the air pollution program in Maryland and a member of Metro Washington Council of Government's air quality committee (MWAQC). I am now retired and writing today as a concerned, well-informed citizen who is doing volunteer work to support communities in Maryland.

I have worked with the community to try and set up a time to discuss this project with DC DOT and DC DGS. This community meeting has never happened.

As you know, racial equity, climate justice, environmental justice and energy justice are amongst the highest priorities for areas like the metropolitan Washington region. Mayor Bowser and the DC are nationally recognized leaders on these difficult issues. My letter today urges you to continue to demonstrate strong leadership and work with the Mayor to build the DC DOT and DC DOT project in a more appropriate location.

As I write you, DC DOT and DC DGS are 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 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. Again, this is a classic case of government driven 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, the leadership in DC would not 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 Maryland community of color to breathe that unhealthy air?

I recognize that this is a very difficult and sensitive issue. I am bringing it to your attention as the District has historically demonstrated real national leadership on how to address racial justice issues. I urge you to focus on government supported 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 project in the Ivy City community of color in the District of Columbia.

In closing, I believe that the quote from Mayor Bowser in the November 14 Washington post is very important:

"I believe in neighborhood-focused, supported development that delivers what neighbors want."

Racial equity and energy, environmental racism will be some of the most important issues that DC will need to address over the next few years. I urge you to show real leadership, relocate the Claybrick Road project and begin to work with your regional partners 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 several 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. Attachment 4 and 5 November 16th letters to TPB and MWCOG CEEPC. Attachment 6 is a May 2022 letter from MDE to Carla Longshore on this issue. Please do not hesitate to contact me. I look forward to the leadership I hope the District will show on this very difficult issue.

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Cc: Carla Longshore, DC DOT
Kelly Crawford, Air Director, DC DOEE
Jeff King, MWCOG
Kanti Srikanth, MWCOG

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December 30, 2022

Christain Dorsey

Chair, MWCOG Board of Directors

Takis Karantonis

Chair, Metropolitan Washington Air Quality Committee (MWAQC)

777 North Capitol St. N.E.

Suite 300

Washington, DC 20002

Chairman Dorsey and Chairman Karantonis:

Thank you for providing the opportunity to submit comments for consideration at the November 9, 2022 MWCOG Board and December 7, 2022 MWAQC meetings.

I also appreciate the written and verbal responses to my comments and letters provided by the MWCOG leadership.

I am again writing today to comment on a critical issue now surfacing in the Washington, DC metropolitan area ... racial inequity. I am concerned that you are focusing on the District of Columbia's Claybrick Road Project ... where the real regional issue is how regional air quality, transportation and land use policies are creating air pollution hot-spots in communities of color and how these regional policies are unintentionally promoting environmental racism throughout the Washington region. The Claybrick Road project is just one of many examples of how MWCOGs regional policies are driving environmental racism in the real world.

I have attached my December 5th letter to MWAQC that provides more detail on this issue.

I am also attaching a very short summary of the three key steps that I believe the MWCOG leadership and Committees need to begin to address to begin to fix this very serious, but technically and politically difficult problem.

During the December 7, 2022 MWAQC meeting, Chairman Karantonis described the mission of MWAQC, which is primarily to coordinate the development of regional air quality plans, and how the Claybrick Road project and environmental justice were not clearly part of the MWQAQC mission. I respectfully disagree with that. EPA is now requiring that environmental justice and real world environmental racism issues like the Claybrick Road project be addressed as part of regional air quality plans also referred to as "SIPs" or State Implementation Plans. I am surprised the MWCOG staff was not aware of this. I have cc'd Cristina Fernandez, a friend of mine and the EPA Region 3 Air Director. I am certain Cristina would be happy to brief MWAQC or MWAQC TAC on this critical new emerging area of SIP development. This issue also fits into several other EPA initiatives that are designed to ensure that environmental justice issues are addressed as part of projects that involve federal funding.

I would be happy to discuss these issues or to provide briefings to MWAQC, MWQAC TAC, CEEPC or TPB.

At a minimum, I would encourage you to ask the MWCOG staff to brief the MWCOG leadership on how widespread the issue of environmental racism, similar to the Claybrick Road Project, is throughout the region.

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 and how existing regional air quality and transportation policies are driving racial inequity. 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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Cc: 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
Cristina Fernandez, USEPA
Dr. Sacoby Wilson, UMCP CEEJH
Dylan Galloway
Sheila Salo
Karen Moe
Laila Riazi

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January 10, 2023

The Honorable Muriel Bowser
Mayor, District of Columbia
John A. Wilson Building
1350 Pennsylvania Avenue, MW
Washington, DC 20004

Mayor Bowser:

I am writing as I am concerned that you have not been adequately briefed on a proposed high polluting project that the District of Columbia (DC) Department of Transportation (DDOT) is proposing be built in an overburdened community of color in Prince George's County, MD.

My name is Tad Aburn and I am currently retired, but was, through November 2022, the Air Director for the Maryland Department of the Environment (MDE). I have worked with Tommy Wells and I am good friends with both Kelly Crawford and Hannah Ashenafi in your DC DOEE offices. I am currently doing volunteer work for overburdened communities in Maryland. I work closely with Dr. Sacoby Wilson and his University of Maryland Environmental Justice Center.

What is being proposed is a classic case of government driven environmental racism. I know of your stellar record and commitment to environmental justice issues and believe that you would not allow the DC DDOT project to be built in Ivy City or one of the Districts other environmental justice communities. I can only presume that you have not been well briefed on the DC DDOT proposed project in a Maryland environmental justice area on Claybrick Road, just outside of DC in Prince George's County. The project, which links to the metropolitan area's efforts to electrify buses, is well intended and will provide significant environmental benefits to the residents, the primarily white residents, of the region ... It is unfortunately being done at the expense of a small, overburdened community of color.

I have attached a recent letter to Dr. Amber Hewitt requesting her assistance with this issue. It includes additional details on the project. I have also attached a March 2022 letter from MDE to DC DDOT on this issue which has never been answered. In working with the community, it is very clear to me that transparency and not working openly with the community are also major issues.

In closing, I thank you for your leadership in the area of environmental justice and respectfully ask that the District consider an alternative, more appropriate site for the proposed Claybrick Road Project. In a meeting with the three Maryland Mayors who have expressed concern over this project, your senior DC leadership acknowledged that other sites were available. I urge you to relocate the project.

Respectfully

George S. (Tad) Aburn Jr.

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Cc: Dr. Sacoby Wilson, UM CEEJH
Dr. Amber Hewitt, DC ORE
Tommy Wells, DDOE
Carla Longshore, DDOT
Kelly Crawford, DDOE
Hannah Ashenafi, DDOE
Phil Mendolson
Sheila Sailo
Kaern Moe
Laila Riazzi
Dylan Galloway

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February 15, 2023

Reuben Collins
Chair, MWCOG Transportation Planning Board (TPB)
Members, MWCOG TPB
777 North Capitol St. N.E.
Suite 300
Washington, DC 20002

RE: Additional Information for the 02/15/2023 TPB Meeting

Chairman Collins, Board members, thank you for providing the opportunity to provide public comment for the February 15, 2023 TPB meeting. This letter is the letter containing the additional information mentioned in my short written public comments for the 02/15/2023 TPB meeting.

My name is Tad Aburn. Last year 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 citizen.

My comments today, focus on two key transportation and environmental protection issues that are now critical in the Washington, DC metropolitan area ... the key roles that transportation planning has in addressing environmental justice and climate change.

The attached January 30th letter to the Air and Climate Public Advisory Committee (AQPAC) provides additional information on these issues.

The issues are not new issues.

At your November meeting, my comments and letter focused on a specific project, the District of Columbia's Claybrick Road Project in Prince George's County, Maryland - a poster child for government supported environmental racism. My comments and letter

on January 18th highlighted how regional transportation, air quality and land use policies are now driving unintentional racial inequity across the entire region. Today I am urging TPB to work through MWCOCG to update two critical transportation issues driven by climate change.

For the issues raised in November and January, it would be very helpful if TPB could provide an update on any activities that the Board or its members are pursuing to address those issues.

The two climate change issues are:

1. The work TPB is now doing to meet current MWCOCG climate change goals (50% by 2030) may be wasteful as the region needs to update its climate change goals to be consistent with the science and the goals set by other leadership organizations. Climate change goals in the 60% reduction by 2030 ... and net-zero emissions by 204 range ... are more consistent with the science and goals set in other leadership areas. This is particularly important to transportation planning as the strategies to meet the weaker, short-term climate change goals may not be the same as the strategies needed to meet tougher, long-term climate change goals.
2. TPB needs to include carbon dioxide (CO₂) as part of the transportation conformity process required under the Clean Air Act. This will ensure that updates to the region's Transportation Improvement Plans (TIPs) and Constrained Long-Range Plans (CLRPs) are consistent with the region's climate change goals ... before those plans are adopted. The models used by TPB to complete transportation conformity analyses already produce results for CO₂, so this should not be a resource intensive task to undertake.

In closing, climate change, racial equity and environmental racism will be amongst the most important issues that MWCOCG and TPB will need to address over the next 10 years. I urge you to show real leadership and begin to address these difficult issues.

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

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Cc: TPB Members
Dr. Sacoby Wilson, UMCP CEEJH
Ted Dernoga, Prince George's County Council
Hannah Ashenafi, DC DOEE

Additional information is provided in my letter to TPB dated 2/15/2023 provided to COG staff and available in your Board packet. This letter attaches a letter to ACPAC (the region's climate change public advisory committee). The issue will also be raised to CEEPC. Unfortunately, these committees do not routinely provide the opportunity for public comment at their meetings.

In closing, transportation planning, racial equity and climate change are three of the most important issues that TPB and MWCOG must address. I urge you to show real leadership and aggressively pursue solutions to these critical issues.

Attachment 2 - Three Basic Steps that Need to be Implemented by MWCOG to
Begin to Address Environmental Racism in the Washington, DC Region*
December 20, 2022

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 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 paper was drafted by Tad Aburn. Mr. Aburn worked for 40 years for the Maryland Department of the Environment (MDE), was the MDE Air Director and a member of MWAQC for over 10 years, chaired MWAQC TAC multiple times and played a key role at MDE in beginning to implement policies and programs to address environmental racism from air pollution. Mr Aburn has recently retired.