Copy of Comments Made by Tad Aburn¹ MWAQC Environmental Justice Subcommittee Meeting August 28, 2024

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Madame Chair, Subcommittee members, thank you for providing the opportunity to provide public comment today.

My comments today focus on the question the Subcommittee has asked for public input on ... That question is:

"How would you define the problem of environmental justice and air quality"

My response is based upon being an air pollution professional for over 40 years and ... more importantly ... working, somewhat fanatically, over the past 8 years with many different communities, organizations and technical and policy experts on the issues of environmental justice and air pollution hotspots.

I have divided my comment into two pieces:

- First ... what ... exactly ... is the problem? ... and then ...
- What caused the problem.

So, what is the problem.

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

The problem is ... that despite the great progress being made to clean up the air for most people ... there continue to be community-sized, high-risk air pollution hotspots across the Country. Air pollution experts have known this for decades ... But right now the science is coming in at a feverish rate ... the science ... the research ... the data ... are all very clear. The hotspots exist and the individuals who live in these areas breathe air that is much worse than the air that you and I breathe. It is very dirty ... very unhealthy ... and very inequitable compared to the air that the majority of the population now breathes.

The areas that breathe the unhealthy air are almost always low income areas and are often made up of individuals of color.

That ... in a nutshell ... is the problem.

Again, the problem is very real. The exposures are very high-risk and very inequitable. I applaud MWAQC for deciding to fix this very serious but difficult problem.

So how did this happen?

Unfortunately, the folks in the room today ... including me ... maybe without knowing it ... have helped create this terrible situation. The Clean Air Plan ... called the SIP ... that MWAQC has worked on for the last 30 years has actually evolved into a clear form of unintentional, government-supported, institutionalized, systemic environmental racism.

The sources and roadways that create the air pollution hotspots are all included in and covered by the SIP. The SIP builds off of the region's transportation plan and is implemented using existing ... now outdated ... land use and zoning policies.

What happens is that the SIP ... in combination with regional transportation, land-use and zoning policies ... pushes all the dirty businesses and roadways into the areas zoned for industry that are now

experiencing the high-risk, air pollution hotspots. Again ... these areas are often low-income areas, areas where housing costs are low and often populated by individuals of color. There are virtually no regulatory monitors in these areas.

The problem ... and the risk ... is made even worse as the individuals that are breathing the bad air ... because all the dirty sources and road are pushed into the same area ... are being exposed to multiple air pollutants at the same time ... traditional pollutants like smog and particulates but also toxic air pollutants like black carbon and cancer causing diesel particulate. This cumulative exposure is somewhat unique to the EJ hotspot areas as most of us breathe just a few air pollutants at the same time. In the EJ hotspot areas they are breathing dozens, maybe hundreds of air pollutants ... all at the same time ... at levels that are higher than what you and I breathe. If you have ever walked through one of these areas you know exactly what I mean. You can smell and taste and feel the air. It's very scary.

Simply stated, the problem is us. It has been created by the SIP and other government policies that have unfortunately evolved into a clear example of government supported, systemic environmental racism.

In closing, I again applaud MWAQC for taking on this tough issue and continue to volunteer to help in any way I can to make the MWAQC Environmental Justice Action Plan the best plan in the Country.

Thank you again for providing the opportunity to provide public comment.