

Copy of Comments Made by Tad Aburn¹
MWAQC Environmental Justice Subcommittee Meeting
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Co-Chairs, MWAQC Environmental Justice Subcommittee members, thank you for providing the opportunity to provide public comment today.

First, I would again like to acknowledge the amazing effort made by the three Co-Chairs of the MWAQC EJ Subcommittee, the MWAQC leadership and the MWAQC staff for the inclusive process they have run to complete a first, partially complete draft of the MWAQC EJ Action Plan. This early draft was released in late February. Unfortunately, many stakeholders did not know that the draft had been released.

These short verbal comments today, build from the comments submitted last week by a large group of EJ communities and other EJ organizations ... and my own individual comments ... which are much more detailed. These comments are included in the MWAQC record and also attached. I would urge you to read these comments and to also request a detailed briefing from staff.

The group I have worked with includes the Cheverly Environmental Justice Action Team or EJAT, the DC EJ Coalition, The Campaign to Reduce Lead Exposure and Asthma, the Coalition for Environmentally Safe Communities, Young, Gifted and Green, the Assembly of Petworth, Yachad, CARECEN, Sierra Club, Empower DC and others.

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.

My comments today focus on the six most important pieces of the draft, early release of the action plan **THAT ARE MISSING.**

In simple terms, the current draft is not really an action plan at all, it's a partially complete resource guide or guidance document. It has no goals, no specific EJ areas to address, no commitments or responsibilities for any MWAQC members and no deadlines.

The early draft document represents a reasonable first draft of a **small piece** of an action plan. That said, it is far from complete. There are many sections left blank. The document contains some very useful materials, but it is also missing the core elements of what is needed to have an effective action plan that will actually result in improved air quality and reduced risk in overburdened EJ communities in the MWAQC region. These missing elements have been consistently supported in the numerous comments you have received from communities, advocacy groups, academic institutions and other stakeholders over the past two years.

The Critical Missing Elements in the February Draft of the MWAQC EJ Action Plan include:

- **NUMBER ONE - THE PLAN MUST DRIVE REAL ACTION ...** The MWAQC EJ Action Plan needs to drive real action, not just be a resource guide or guidance document that MWAQC members can choose to use or ignore. History shows that guidance documents with no follow up or accountability system are often simply “put on the shelf” and never used. Given the work accomplished by the MWAQC EJ Subcommittee and the COG staff over the past year, it is now very clear that, despite the much cleaner air breathed by the vast majority of residents in the MWAQC region, that certain communities, often communities of color, are breathing air that is much, much dirtier and

much more unhealthy than the air breathed by the vast majority of the ... primarily white ... air breathers in the MWAQC region.

- **NUMBER TWO - THE PLAN MUST INCLUDE GOALS AND ACCOUNTABILITY** ... All meaningful action plans establish goals, benchmarks or some other trackable metric that will show how well the action plan, in this case the MWAQC EJ Action Plan, is working. Attached to the goals, there needs to be some kind of accountability system that tracks the progress being made by each responsible party to meet the goals and the timeframes attached to those goals.
- **NUMBER 3 - THE PLAN MUST IDENTIFY SPECIFIC AREAS OR COMMUNITIES WHERE THE MWAQC EJ ACTION PLAN WILL BE IMPLEMENTED** - There needs to be a specific process for identifying and prioritizing specific EJ areas that will be covered by the action plan. Because the planning and implementation process for the action plan is a large, relatively new effort, areas should be prioritized and some kind of phased approach needs to be used to ensure that the areas of greatest concern are prioritized and acted on quickly and that all areas suffering from inequitably high air pollution risks are ... over time ... addressed.
- **NUMBER 4 - THE PLAN MUST INCLUDE AN IMPLEMENTATION PLAN AND DEADLINES** - All credible plans include a series of steps that are built into an implementation plan. The implementation plan must include timeframes (or deadlines) for when each step must or should be completed by each responsible organization.
- **NUMBER 5 - THE PLAN MUST INCLUDE ACCOUNTABILITY** - The plan needs to have a system to ensure that all public health protection goals are met and that responsible parties are held accountable for meeting goals and for accomplishing all interim actions in a timely manner needed to meet those goals

- **NUMBER 6 - THE PLAN MUST BUILD FROM THE REAL WORLD EXPERIENCES OF THE LOCAL COMMUNITIES THAT ARE IMPLEMENTING AIR POLLUTION FOCUSED EJ ACTION PLANS -**

There are already several areas in the MWAQC region that are implementing community driven action plans. There are many lessons, both positive and negative, to be learned from these ongoing community-based efforts to clean up the air in their community. One example is the Cheverly, Maryland area EJ partnership. Their effort literally could be used as a model as it includes virtually all of the pieces needed to make progress. MWAQC has been provided with hundreds of pages of information about the Cheverly effort. The Cheverly area has already seen a 25% reduction in fine particulate air pollution levels since the beginning of the partnership. The MWAQC EJ Action Plan is missing many of the pieces that helped the Cheverly area make progress.

The written comments that have been submitted and are attached include a detailed example of an MWAQC EJ Action Plan that includes all of the missing elements described above.

In a nutshell, the proposed detailed example of an MWAQC EJ Action Plan would call for each County and the District to get started by initiating one partnership in each of their jurisdictions. Each partnership would ... include state and local representation ... build a community based air monitoring network ... and ... adopt a plan to achieve significant progress in three years and to resolve all issues within five years. State air agencies would lead an effort to implement three common sense, low-resource control efforts to quickly reduce key emissions by up to 50% as part of the 3-year reasonable progress step. MWAQC would provide leadership by establishing a Regional EJ Support Center to assist the partnerships and MWAQC members with numerous parts of the plan where regional coordination and collaboration makes sense and dramatically improve efficiency.

In closing, thank you again for requesting comment on this very early draft of the MWAQC EJ Action Plan. We urge you to quickly have several additional stakeholder meetings to address the serious issues raised in today's comments and earlier public comments, before the plan is taken to MWAQC for approval. The larger group of commentators would help set up and run these important, fast-track stakeholder meetings.