

January 17, 2024

Remarks for Public Comment

ACHD Board of Health Meeting
Gold Room, Room 410 (4th floor)
Allegheny County Courthouse
436 Grant Street
Pittsburgh, PA 15219

Dear ACHD Board Members and Leadership:

I am Matthew Mehalik, Executive Director of the Breathe Project. Thank you for this opportunity to provide public comment.

2024 is a new year and an opportunity for examining and improving the effectiveness of Allegheny County governance. This should include reforming the Allegheny County Health Department. I wanted to provide some information to assist with needed reforms at this agency.

- 1. ACHD needs to re-focus its priorities on impacted environmental justice communities so that more effective engagement with our region's most impacted residents can be happen. Some recent facts illustrate how neglectful this organization is on this dimension:**
 - Prior ACHD leadership used to meet with community and environmental groups regularly with a goal of problem solving at the agency. This has changed under the recent director and deputy director's tenures. The current leadership has refused to meet with these groups for over 2 years. In fact, the agency's leadership currently stonewalls and ignores requests for the community regularly and takes actions that actively burden community members.
 - For example, on December 7, 2023, ACHD released two major permits for public comment: Clairton Coke Works Operating Permit and the ATI Installation Permit with public hearings on January 10 and 17. Each of these permits are gigantic. Both are out of date for years (CCW was out of date since 2017; ATI has never had such a permit). The CCW permit has been drafted three times. It was rejected as deficient by the EPA in the fall of 2023. To drop both permits at the same time on the community over the holidays is an example of a huge burden on the community. At least two sets of community groups wrote to ACHD requesting an extension of the comment period for an additional two weeks with sign ons by many community members and groups. ACHD did not even bother to acknowledge these requests.
 - Instead, they proceeded with a hearing in the midst of a leadership transition and community requests.
 - Despite requests to offer an opportunity to participate with a virtual option – something that EJ community members are granted regularly by other governing agencies—ACHD did not offer this option.
 - ACHD announced at the January 10, 2024 hearing that there would be no stenographer for the meeting. This is explicitly against language in Article XXI that requires stenography for installation permits – which is what the ATI permit is.
 - All ACHD leadership members present did not introduce themselves to the hearing attendees, nor was it evident that they were taking notes or acknowledging the value of what the presenters stated.

- Presenters were rudely talked over when 30 seconds were remaining to testify and at the conclusion of 3 minutes. Other organizations provide a visual timer to speakers to assist with timing of comments.
- 2. **ACHD needs to re-center its priorities to default toward protecting public health, not prioritizing the interests of industry.**
 - The EPA ordered ACHD to make changes to the earlier draft of the CCW permit in 2023 because it was deficient in terms of federal air quality laws. ACHD did not make all of the needed updates as required and has tried to push this permit through during a leadership transition.
 - During the December 2023 Air Quality Advisory meeting, several committee members praised a pro-industry group's report on air quality while disparaging the American Lung Association. What does it mean when our health department boosts industry groups while ignoring and disparaging public health nonprofit and community groups?

It means that reform is required at the root of the organization so that priorities to protect public health from toxic air pollution and listening to community voices becomes a core value. It is time to make major changes at ACHD.

Sincerely,

Matthew M. Mehalik, Ph.D.