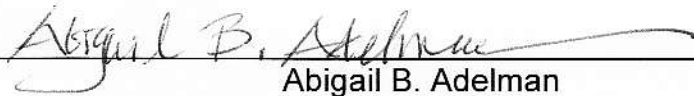


Attachment K: Health Matters

A handwritten signature in cursive script, reading "Abigail B. Adelman", is written over a horizontal line. The signature is fluid and extends slightly beyond the line on both sides.

Abigail B. Adelman

HEARING EXAMINER FILING FOR S-2863
Submitted March 26, 2013 to Mr. Martin Grossman, Hearing Examiner
From Abigail B. Adelman, Chair, Stop Costco Gas Coalition

HEALTH MATTERS

BACKGROUND

This filing addresses the health issues raised with the Special Exception application by Costco, Inc. to install a members only (m/o), 16 nozzle regional fueling depot (mega gas station) adjacent to the Costco warehouse store located in the southwest quadrant of Westfield Wheaton Mall in Wheaton, Maryland. EPA defines large gas stations as those pumping more than 3.6 million gallons of gas per year. The proposed mega Costco gas station will pump **at least 12 million gallons of gas** per year; *3.5 times more than a large gas station*. This mega gas station location is strongly opposed by the adjacent Kensington Heights community.

This is the second Costco Special Exception application to locate this members only, megastation in the above noted location. The first application was withdrawn by Costco after intense community opposition resulted in the passage by the Montgomery County Council of ZTA 12-07 in July, 2012 and effective August 13, 2012. The ZTA defined a 300 foot minimum standard buffer zone for large gas stations (those pumping more than 3.6 million gallons of gas per year) from schools, daycare centers and any outdoor use categorized as a cultural, entertainment and recreation use. To meet this new standard, Costco moved the gas station site approximately 275 feet to the east in the same parking lot of the southwest quadrant of Wheaton Westfield Mall, withdrew S-2794 and applied for a new Special Exception; S-2863.

This new site and SE application further intensified neighborhood opposition as it *violates* the intent of ZTA 12-07 by now placing the gas station location within 125 feet of residential homes and 850 feet from Stephen Knolls School, the down county school serving profoundly disabled and medically fragile children. *The homes and school are all downwind and downhill from the proposed gas station location. Scientific modeling and research shows both populations will have a significantly increased risk of being affected by the pollution from the station.*

Costco's Land Use Report states on page 19 that locating a members only, 16 pump mega gas station, 125 feet from residential homes will not adversely affect the health or general welfare of residents. And on page 25 of the same report, Costco states that there are a total of only 20 residents located within a 400 foot radius. Both statements have no basis in fact.

NEW EPA REGULATION

In December, 2012 the Environmental Protection Agency issued a new standard for Soot as a federal court found the previous 1997 standard too weak to adequately protect public health. The new standard reduces particle pollution from the 1997 standard of 15 micrograms per cubic meter of air to the new standard of 12 micrograms per cubic meter of air.

EPA based its action on health studies that found exposure to fine particulate matter (PM2.5)

brought a marked increase in heart and lung disease, acute asthma attacks and early death. *Children, older people and adults with heart and lung ailments are particularly vulnerable.* (1)

Lisa Jackson, EPA administrator, states "These fine particles penetrate deep into the lungs, causing serious and costly health effects. As the mother of two sons who have battled asthma, the benefits [of this new lowered standard] are not just numbers or abstract concepts." (1)

The proposed mega gas station site is not likely to meet this new regulation. When factoring in the new EPA Soot standard (1,2) the Costco/Sullivan model will likely exceed the new level of 12 micrograms per cubic meter at the most vulnerable receptors: the nearest single family residences, town homes and the school.(13) Due to the delayed Costco warehouse opening, the additional traffic impact from the store is factually unknown at this time but can reasonably be projected to increase the particle pollution at the site.

New public health studies and laboratory experiments suggest that at every stage of life, motor vehicle emission fumes exact a measurable toll on mental capacity, intelligence and emotional stability. (7) **The research literature on ambient air pollution is expanding exponentially. Scientists are finding important adverse health effects from air pollution at levels once considered safe.** The recent EPA standard revision on PM2.5 is a result of this concern.

HEALTH MATTERS

Jeffrey Zyontz , Legislative Attorney for the Montgomery County, County Council states in a Memorandum to the County Council dated July 20, 2012, "The source of all zoning authority is the power to protect the health, safety and welfare of a community."And further "Staff concludes that there **is** a rational basis for treating gas stations pumping more than 3.6 million gallons of gas per year differently from other stations." pg.7

Montgomery County Code Ordinance, Division 59-G-1 Special Exceptions-Authority and Procedure, 59-G-1.21 General Conditions (a) (8)- states- *Will not adversely affect the health, safety, security, morals, or general welfare of residents, visitors, or workers* in the area at the subject site, irrespective of any adverse effects the use might have if established elsewhere in the zone.(emphasis added) Although this section presents no standard on matters of Public Health, it is the only section in the Special Exception Code applicable to a discussion of the adverse affect on health, safety and general welfare that S-2863 application will cause.

Dr. Breysee , a Professor of Environment Health Sciences at the John Hopkins Bloomberg School of Public Health, pulling from the California Air Resources Board (CARB) which recommended that a large 3.6 million gallons of gas per year throughput facility be located at least 300 feet from sensitive land uses (homes, schools), states "that the excess risk for a 12 million gallons per year throughput facility is three-fold". Or roughly 950 feet. Compare this to the 125 foot distance to homes if this large fueling depot is permitted and one can readily see that the proposed location will pose a significant risk for human health.(3)

Mr. Angelo Bianca, Deputy Director, Air and Radiation Management Administration of the Maryland Department of the Environment states in a letter of July, 2012 , "There are a number of

petroleum based toxic air pollutants that are emitted from gasoline stations that pose some level of risk to public health from the delivery and dispensing of fuel and the idling of vehicles. The difficulties are quantifying that risk, especially the incremental risk beyond existing levels, and determining what risk is acceptable. A further complication is that available tools do not capture very well the cumulative effects of multiple toxic air pollutants or the incremental effect a single pollutant from multiple sources may have on public health. **Given these issues and those mentioned later, the more distance that can be placed between a source and residences and community gathering places is certainly beneficial to minimizing risk.**”(14)

Mr. Bianca goes on to reference that the California Air Resources Board (CARB) and the EPA have published guidance regarding locating megastations in communities. Both agencies’ guidance *supports the concept that distance can play a role in reducing potential exposure to risk.*(14)

Science has identified the toxins from gasoline pollution (see charts below) and their deleterious effects on health. **And researchers note that particular attention must be focused on the most vulnerable populations; children, the elderly, adults with existing health problems . Empirical evidence also shows that exhaust fumes from roadways extend further than previously thought- about 10 times farther - and can be up to 1.5 miles downwind.**(7)

The major health danger connected with a 16 nozzle regional fueling depot is pollution from evaporation and emissions. Evaporation from cars actively fueling as this disperses vapors from the empty tank into the atmosphere. Emissions from motor vehicles idling while waiting to fuel. These emissions are designated by EPA as Hazardous Air Pollutants (HAP) and most are considered carcinogenic. They are charted below.

Gasoline Toxins

Below is a list of the toxins involved in *gasoline evaporation* and their characterization.(13)

<u>Gasoline Constituents</u>	<u>EPA Hazardous Air Pollutant (HAP)</u>	<u>Carcinogenic?</u>
Benzene	Yes	Yes for Humans
Ethylbenzene	Yes	Possible for Humans
N-Hexane	Yes	Unknown
Toluene	Yes	Unknown
Xylene	Yes	Insufficient Evidence

The sources for evaporation are:

- from diesel tanker fueling of underground tanks (projected to occur 2-5 times daily with a 45" fueling time for each delivery)
- from underground storage tanks themselves
- from cars during fueling and idling

The chart below illustrates *toxins involved in incomplete combustion of gasoline* and their characterization.(13)

<u>Products of Incomplete Gasoline Combustion(PICS)</u>	<u>EPA- HAP</u>	<u>Carcinogenic?</u>
Benzene	Yes	Yes for Humans
1,3 butadiene	Yes	Yes for Humans

continued

<u>Products of Incomplete Gasoline Combustion(PICS)</u>	<u>EPA- HAP</u>	<u>Carcinogenic?</u>
Formaldehyde	Yes	Yes for Humans
Acetaldehyde	Yes	Reasonably Anticipated for Humans

For this proposed m/o mega gas station, PICS from motor vehicles will be sourced at:

- the ring road traffic,
- the gas station itself (entry, exit, lines of idling cars),
- area roadways,
- all Mall parking lots,
- existing background pollutants.

Hydrocarbons and nitrogen oxides, emitted by motor vehicles, react with sunlight to form ground level ozone. The ozone levels tend to be highest on warm, sunny days *and often peak in mid afternoon when children are most likely to be playing outside*. Ozone is a powerful oxidant and respiratory tract irritant in adults and children causing shortness of breath, chest pain when inhaling deeply, wheezing and cough. In healthy adults and children, ozone causes airway inflammation and hyper reactivity, a decrease in pulmonary function and an increase in respiratory tract symptoms. (9)

Particulate Matter (PM) is increasingly implicated as a major culprit of lung and cardiovascular disease. PM, the fine airborne particles in ozone, materializes directly in the atmosphere, through the oxidation of the polluting agents in ozone (sulphur dioxide, nitrogen oxides and volatile organic compounds). The main source of PM's is gasoline combustion.

Three categories of Particulate Matter are found in vehicle emissions: PM10, largest; PM 2.5 smaller, dangerous and the most studied and Ultra Fine Particles (UFP) the most dangerous as they have an enormous surface to volume ratio (far greater than the other 2 sizes) which is ideal for the adsorption of toxic metals and poly-aromatic hydrocarbons (PAHS) some of which are carcinogenic. *The UFP's are inhaled and retained very deeply in the lungs causing inflammation, impaired breathing and pulmonary diseases (COPD, asthma, emphysema, cancer and other conditions).*(5)

In 2010, the American Heart Association updated their concern about particulate matter, first noted in 2004, by concluding **that exposure to PM2.5 over a few hours to weeks can trigger cardiovascular disease related mortality and nonfatal events;** longer term exposure (a few years) increases the risk for cardiovascular mortality to a greater extent than exposure over a few days or months and reduces life expectancy within more highly exposed segments of the population by several months to a few years.(10)

Consider that with 16 pumps operating, approximately 200 cars will fuel per hour. At 15.5 hours of operation on weekdays approximately 3000 cars will be the throughput per day. On weekends, when children and adults will be in their homes and outside in their yards, the gas station will operate 13 hours per day with a throughput of approximately 2500 cars per day.

To the 3000 vehicles fueling add on roughly 620 cars (40 cars/hr) idling and emitting toxic emissions with *the result that approximately 3620 vehicles daily will be emitting tailpipe toxins 125 feet away from residential homes*. This is conservative estimate. Several times we have counted 72 vehicles idling at the Costco gas station in Beltsville, MD. These figures show that there is a rational basis for treating gas stations pumping more than 3.6 mgpy and mega gas stations pumping 12 mgpy differently than other, much smaller stations which is what the code was regulating when it was written in 1954..

The health danger is extremely significant for the loading dock workers as they are in close proximity to (about 30- 40 feet away) and on grade with the station. The Code includes workers in 59-G-1.21(a)(8). There is an existing high wall surrounding the dock, attached to the warehouse that encapsulates and ensures that workers will be breathing toxins and particulate matter PM2.5 and Ultra Fine Particles (UFP) when exposed during the day and at night when the major portion of deliveries occur workers will be surrounded by diesel fumes . The health risk for these workers is extremely high.

Additionally, there is concern about the warehouse store air handlers located about 30 feet from the evaporation and emission source. ***Will the fresh air intake system bring the emission toxins directly into the warehouse, to surround store workers and store customers in exhaust pollution? Has this question been considered, and evaluated?*** It is a question, we feel, that must be addressed before any position can be taken on the S-2863 application.

People living 125 feet away, down wind and down hill are much too close to the evaporation and emission toxins . The 8 foot high fence that will be placed at the ring road will not contain the pollution plume. No fence can contain air flowing in the atmosphere. In fact, the fence ends at the west side of the warehouse so there will be no fence installed behind the townhouses and the school.

It is germane to note here that we are already in trouble. The America's Health Rankings,(started in 1990), the 2012 Edition, found that the State of Maryland's ranked **40th** for high levels of Air Pollution . For Particulate Matter 2.5 , Maryland's value was very high at 10.9 micrograms per cubic meter of air. (12). In fact, Maryland today is dangerously close to violating the new EPA standard for soot pollution of 12 micrograms per cubic meter. (1). Adding a mega gas station to a Mall already contributing to air pollution by traffic circulating and parking will exacerbate an already existing toxic pollutant condition.

CHILDREN'S HEALTH MATTERS:

The vulnerability of children to automobile emissions begins in utero. In New Jersey, premature births (a risk factor for cognitive delays) were found to have dropped **10.8%** in areas around toll plazas after the introduction of E-ZPass which significantly reduced idling cars at toll booths.(7)

Scientists are only beginning to understand the basic biology of toxic neural affects especially from prenatal or lifetime exposures. Research has shown that by age 3, children exposed prenatally to high exhaust levels were developing mental capacities more slowly; by age 5 their IQ scores averaged 4 points lower on standardized intelligence tests than those of less exposed children. These differences were significant in terms of later educational development.

By age 7, the children also were more prone to depression, anxiety and attention problems than children growing up in cleaner air, documented by separate research teams in the U.S., China and Poland. There is also data that indicates air pollution might be a risk factor for autism.(7)

During the early postnatal period, the developing lung is highly susceptible to damage after exposure to environmental toxins and motor vehicles represent the principal source of air pollution in many communities. *Increased respiratory tract complications in children, wheezing, chronic productive cough and asthma hospitalizations have been associated with residence near high motor vehicle emissions. Children are more vulnerable to the adverse effects of air pollution than are healthy adults as their lung development continues through adolescence.*

Children have increased exposure to outdoor air pollution, compared with healthy adults, as they have higher minute ventilation and spend more time outdoors. In communities with higher levels of urban air pollution (nitrogen dioxide, highPM2.5 levels UFP's, hydrocarbons) children show decreased lung function growth and children with asthma were more likely to have bronchitis symptoms.(9) This in turn leads to reduced school attendance which by extension threatens learning which reduces educational attainment.

ADULT HEALTH MATTERS:

Health issues that can be caused and exacerbated by motor vehicle air pollutants particularly in older adults are; Lung Diseases: Chronic Obstructive Pulmonary Disease (COPD), Emphysema, Asthma and Lung Cancer, Leukemias, Arteriosclerosis, Cardiovascular Diseases and Diabetes and reduced life span. A report from France finds that 6 - 11% of all lung cancer cases identified in people over 30 years of age are caused by automobile emissions.(5)

Other health issues associated with exposure to nearby motor vehicle pollutants are memory loss, reduction of reasoning ability and increased irritability. Additionally, increased hospitalization of older adults living near a source of motor vehicle pollutants has been recorded.

Air pollution kills more than breast and prostate cancers combined and the premature deaths associated with particulate matter pollution alone are comparable to deaths from traffic accidents.(6)

STEPHEN KNOLLS SCHOOL HEALTH MATTERS:

Costco states on pg.19 of their Land Use Report that the members only, 16 pump mega gas station will have no impact on the school. We disagree and find this dismissal by Costco concerning the possible adverse health impact from the mega gas station on pupils of this school for medically fragile children troubling.

EPA issued School Siting Guidelines recommending a screening perimeter of 1000 feet from gas stations dispensing more than 3.6 million gallons per year (*these stations are 3 times smaller than the proposed Costco m/o mega gas station*). The proposed siting of Costco mega gas station violates the EPA recommendation. The recommendation should be read in both directions: do not site a school within 1000 feet of a gas station and do not site a gas station within 1000 feet of a school. It makes no sense to allow a mega gas station to be placed closer to a school because the school was there first.

It is clear from modeling that there will be an impact on the school from the proposed mega gas station. (13) And this will be an additional pollution burden, adding to the pollution extant from nearby Georgia Avenue. Although the 850 feet distance allows some pollution dispersal from the gas station, the wind direction and topography (down hill) ensure that the pollution plume will reach the school property .

Stephen Knolls School was well established when I moved into the neighborhood 35 years ago. The Stephen Knolls community and the Kensington Heights community are extremely concerned about the negative health impact this mega gas station will have on the students all of whom are medically fragile.

To illustrate the severity of health issues of the students at Stephen Knolls, I am including a few facts about the student population.(15)

Total Student Population: 98

School Aged Children: 47, Preschool Children: 51

Staff: 85

Medical Needs of School Aged Children:

Oxygen: Five School aged students are on oxygen tanks

Nursing: 8 students have private duty nurses with them throughout the day. These students are cared for by their nurses.

Nursing Services: 28 treatments daily. 10 students on medicines, 1 student requires regular suctioning.

Disabilities: Chronic Lung Disease, Asthma, Respiratory Distress Syndrome, Environmental Allergies, Cerebral Palsy, Down's Syndrome, Rhett's Syndrome. Note that several of the disabilities listed are related to lung and respiratory disease. These conditions will be exacerbated by the increased toxins and pollutants from the proposed gas station.

Use of the Mall: 35-40 students per week.

Stephen Knolls School students use the Wheaton Westfield Mall several times a week to practice life skills. Currently there is a crossing for them to use at an underused section of the Ring Road. Very few of the students are mobile so we are talking about wheel chairs and other mobile conveyances to move the students across the Ring Road . The major increase in traffic from the warehouse (when it opens) and the increased vehicle traffic from the gas station will result in a large increase in toxic vehicle emissions. Student trips to the Mall will be difficult (increased traffic) and unhealthy (emissions).

Note: Stephen Knolls School serves children ages 3 to 21. The school year runs from the end of August through the middle of July. So 10.5 months of the year, for 18 years, these students will be exposed to increased toxic air pollution.

COMMENT ON CHASE COSTCO REPORT

This letter is referenced in Costco's Land Use Report (Exhibit O, pg. 19) as a Health Analysis but was not filed as an Exhibit. It can be found as a file called ChaseCostco Report on the CD filed in December 2012 containing all the lettered exhibits but this letter is not called an exhibit.

Authored by Kenneth H. Chase, MD, FACOEM, this letter accepts without comment Costco's determination that 'neighborhood' is defined as the boundaries of Westfield Wheaton Mall. The boundaries described by Planning staff include the area north of McComas Avenue including single family homes, town houses and Stephen Knolls School for severely disabled, medically fragile children.

Dr. Chase relies on comprehensive sampling data from a Costco station in Sterling, Virginia and modeling data provided by David Sullivan in November 2012, for the proposed members only 16 pump mega gas station in Westfield Wheaton Mall.

Concern is noted in contemporary health studies that the Ambient Air Standards Dr. Chase references are too high and need to be restudied. The Federal courts expressed that concern when they required EPA to lower the standard for PM2.5 from 15 to 12 micrograms per cubic meter of air. **Active research on CO, nitrogen dioxide and other compounds regulated by NAAQS is ongoing as monitoring has shown locations meeting current standards are seeing a spike in the diseases associated with air pollution.**

Dr. Chases' report focuses solely on cancer risks with only asthma mentioned as an additional health concern. He then dismisses any concern that the proposed gas station location will have any affect on nearby residents with asthma. He does not reference the wide range of chronic diseases exacerbated by toxic air pollution including lung diseases, pulmonary diseases, cardiovascular disease, diabetes, mental health deterioration and delayed mental development.

Dr. Chase focuses mainly on concerns regarding diesel fuel. There is no relevance here as the 16 pumps will be dispensing only gasoline fuel, not diesel fuel. There is concern, however, that the projected 2-6 diesel tanker trucks dispatched to fill the underground tanks (each filling taking about 45 minutes) will be contributing idling diesel fumes know to be carcinogenic. Costco assures us that the truck engines will be turned off during this process. This remains to be seen if their SE application is approved. (16)

Dr. Chase appears to not be familiar with current research articles on the topic of toxic vehicle emissions and their effect on air quality and the human health.. Had he done so he would understand that this is a dynamic, changing area of research with new findings of concern being published nearly daily.

CONCLUSION

Locating a mega gas station 125 feet from citizens homes and 850 feet from a school for medically fragile children is an unacceptable health risk. Current, peer reviewed, medical and epidemiological studies address, with increasing concern, current knowledge of the danger inherent in toxic air pollutants from evaporative and motor vehicle tailpipe emissions.

Regulations developed to address this knowledge have a significant lag time. Recognizing the temporal concern about population exposure to toxic air pollutants resulting from medium(4 lane) to high speed, limited access, highways, slow moving to idling local traffic(18) and gas stations, studies conclude that **without specific regulations in place, emphasis must be placed on protecting public health by establishing an adequate margin of safety from sources of toxic pollutants such as mega gas stations and sensitive sites: homes, schools, hospitals and outdoor recreation areas.**

The buffer most often recommended (EPA,CARB) is a minimum of 300 feet from the source to the sensitive site. This proposed site cannot meet even that minimum. Indeed **the closest homes will be 175 feet closer to the pollutant source than the minimum margin of safety.**

I ask that you “Gardez Bien”, protect our community. Please recommend denial of Costco’s Special Exception Application, S-2863.

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Attachment 1

Abigail B. Adelman
3206 University Blvd. West, Kensington, MD 20895
301-942-6893 avtdesigngroup@erols.com

Summary Testimony for the Planning Board, February 28, 2013

Madam Chairman and Members of the Planning Board

Good Afternoon. My name is Abigail Adelman and I am here to speak in strong opposition to Costcos Special Exception Application S-2863.

I have read the Planning Staff report recommending denial of S-2863 -with particular interest in the staff discussion on the potential adverse health effects of this mega gas station on the adjacent population. Staff reviewed and disagreed with Costco's analysis of Volatile Organic Compounds and their cancer risk analysis.

Today, I would like emphasize **the chronic diseases** current scientific literature cites as resulting from exposure to ambient air pollution.

For the past 3 years I have been reviewing scientific, peer reviewed publications on the harmful effects of motor vehicle exhaust. During this 3 year period the scientific literature examining ambient air pollution **has increased dramatically.**

Of specific interest is the concern noted of the proximity of exhaust sources such as extremely large gas stations, those with 16 - 20 fueling nozzles, to sensitive land uses such as private homes, schools, hospitals and outdoor recreation areas. .

Large pollution plumes are created as motor vehicles are fueling and as they idle waiting to fuel. People living 125 to 300 feet away, downwind and downhill from Costcos proposed Westfield Wheaton Mall gas station **location will be unacceptably** close to these emission toxins and vulnerable to chronic debilitating diseases associated with these toxic emissions.

Costco's assertion in their Land Use Report that the fence between the mega gas station and the neighborhood will segregate the 2 areas and therefore there are no adverse health effects is untrue. No fence can contain air flowing in the atmosphere. Nearby residents, children playing in their backyards will be bathed in vehicle emission toxins.

Particulate Matter 2.5 and ultra fine particles from motor vehicle emissions are increasingly implicated as the major disease causing components in ambient air pollution. Public health studies and laboratory experiments suggest that at **every stage of life** motor vehicle emissions exact a measurable toll on mental capacity ,intelligence and emotional stability.

The documented risk is greatest for infants, children and older adults.

Children living in close proximity to dangerous pollution sources such as this proposed mega gas

station have a high risk of suffering from life long chronic diseases as human lung development continues from birth through adolescence. In Children, increased respiratory tract complications, decreased lung function growth, wheezing, chronic productive cough, increased asthma hospitalizations and bronchitis have been associated with residence near high motor vehicle emissions. These chronic conditions result in reduced school attendance which by extension threatens learning and results in lower educational attainment levels.

Children exposed prenatally to high exhaust levels showed, by age 3, slower developing mental capacities that were significant in terms of later educational development. Also by age 7 these children were more prone to depression, anxiety, and attention problems.

Children are our future. Risking children's health is risking our future.

In older adults, chronic adverse health conditions incurred or exacerbated by motor vehicle emission pollutants are: lung diseases such as COPD (Chronic Obstructive Pulmonary Disease), Emphysema, Asthma, Lung Cancer, Leukemias, Cardiovascular Diseases and Diabetes and early death.

Also associated with exposure to nearby motor vehicle pollutants are memory loss, reduced reasoning ability and increased irritability as well as increased hospitalization.

Stephen Knolls School, the down county school for severely disabled and medically fragile children will also be significantly impacted. Costco's proposed gas station site is 850 feet away from children ages 3-21 many of whom are oxygen dependant , many with private duty nurses. This distance violates the EPA recommendation of locating large gas stations (3.6 million gallons of gas per year)1000 feet from schools for healthy children. This station will be is 3 times larger and 150 feet closer to this special needs school.

An unlisted brief letter from a Dr. Chase, dated November 12th, 2012 states there will be no adverse effects on the health of residents. Most of his reasoning appears to be based on diesel fuel which will not be sold at the proposed gas station. Fourteen of the fifteen references listed by Dr. Chase concern diesel fuel only.

Jeffrey Zyontz , Legislative Attorney for the Montgomery County Council states in a memo to the County council on July 20, 2012, "The source of all zoning authority is the power to protect the health, safety and welfare of a community."

I ask that you protect the health and welfare of the existing nearby community .

I urge you to recommend denial of S-2863.

Thank you .