

From: Robert Moore

Sent: Monday, November 06, 2017 3:49 PM

To: Stouder, Heather <HStouder@cityofmadison.com>

Cc: Rummel, Marsha <district6@cityofmadison.com>; Ahrens, David <district15@cityofmadison.com>

Subject: 131 South Fair Oaks proposal

Dear Ms. Stouder,

In the update Alder Rummel e-mailed today she wrote “City staff believe the air quality should not be a concern for residents at 131 S Fair Oaks.” I spent more than 40 years doing toxicology research, have served on US government toxicology panels, have been a Full Member of the Society of Toxicology since 1987, and have dozens of publications in top-notch toxicology journals. I have reviewed every publically available document associated with this proposed development and can find absolutely no data that supports this conclusion.

The agenda for today’s Plan Commission meeting states: “...due to their size, the 33-page air quality study commissioned by the applicant (dated September 12, 2017 with September 21 revision)” ... “were not copied for the Commission's meeting materials”. This is most unfortunate, because those documents analyze the effects on air quality of effluents from only one of the four stacks from the nearby MKC factory. That air quality study is wholly inadequate to evaluate the human health hazards posed by the adjacent MKC factory and therefore should not be accepted as meaningful by the Plan Commission.

The Planning Division Staff Report takes at face value the assertion that “there should not be an air quality concern generated by the Kipp facility for the proposed development (see the attached December 8, 2016 memo from John Hausbeck)”. Not only is there no factual basis for that assertion, the preponderance of the evidence, as given to the Plan Commission by Environmental Engineer Steve Klafka, is that fine particulate matter (PM2.5) concentrations in the entire area exceed EPA standards. Unless MKC installs filters to greatly reduce their PM2.5 emissions, or the developers commit to using HEPA filters on the building’s air intakes to remove fine particulates from the air their residents will breathe, it would be unconscionable for the City of Madison to approve the proposed building.

Since 2012, federal air quality standards state that PM2.5 concentrations on the eight worst days of the year must not average, over three years, more than $35.0 \mu\text{g}/\text{m}^3$, and that daily PM2.5 concentrations over a three year span must not average more than $12.0 \mu\text{g}/\text{m}^3$. It is my understanding that the PM2.5 measurements taken on the roof of Lowell School averaged $14.0 \mu\text{g}/\text{m}^3$, that PM2.5 concentration data at Lowell would have been substantially higher had measurements been taken at ground level, and that no one has taken any PM2.5 measurements on or near the site of either of the proposed South Fair Oaks Avenue housing developments. The communications you have received from

PHMDC demonstrate a fundamental lack of understanding of not only toxicology but even of basic scientific principles.

It may also be relevant to your deliberations that there is compelling evidence that the current EPA standards for fine particulates are not adequately protective of public health.

The developers have provided no plans to protect their residents from spills, leaks, or explosions from either the nearby MKC factory or from train cars traveling on the adjoining railroad tracks. It is essential that worst-case scenarios be determined and plans made in advance for rapid communication with residents of what they should do in the event of an emergency.

Please distribute this message to members of the Plan Commission.

Robert W. Moore, Ph.D.
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