

9/19/2016

To Whom It May Concern,

I would like to express my concern regarding the tentative plan to site a gas station in the parking lot of the Primrose School at Falcon Pointe in Pflugerville, Texas. This type of facility does not complement the current land use and poses an undue and entirely avoidable risk to the health and safety of the children attending the school.

A number of individuals associated with the school have cited concerns regarding the increased traffic through the school parking lot. The Institute of Transportation Engineers (ITE) indicates each pump is estimated to generate 100-130 trips per day. This increases the risk of accidents involving children and families nearby. In addition to consumer traffic, diesel trucks emit more than 100 dBA even while idling (Univ. Michigan). For reference, this is significantly louder than what you hear when operating a hair dryer (average=77) or even a leaf blower (average=78). The National Institute of Health (NIH) cites a threshold of 85 decibels, above which long or repeated exposures can cause hearing loss. Finally, convenience stores also pose an increased risk for crime. The FBI reports that over 88,000 crimes were committed at convenience stores in 2014 (including arson, robberies, and motor vehicle theft).

However, the most important reason that a gas station should not be located adjacent to a school, is that this type of facility endangers the health of the students. The U.S. Environmental Protection Agency has published School Siting Guidelines. This document outlines the potential hazards of gas stations, including air pollution, soil contamination, ground water contamination, vapor intrusion into structures and heavy vehicular traffic. Because of these concerns, the EPA has indicated that gas stations within ~1,000 feet of schools should be evaluated by a qualified environmental professional in the context of a site-specific Health Impact Assessment.

Among the risks that would be evaluated in this type of assessment, the most concerning is benzene exposure. Benzene is found in the air from emissions from burning oil, gasoline service stations, and motor vehicle exhaust. In addition to the short-term risks, such as drowsiness, dizziness, headaches, irritation of eyes, skin, and respiratory system, benzene also causes long term effects. Benzene is a potent human carcinogen (i.e. causes cancer) that has been identified as such by multiple sources (the US EPA, the International Agency for Research on Cancer, the National Toxicology Program, the American Conference of Governmental Industrial Hygienists, and Germany's Commission for the Investigation of Health Hazards of Chemicals in the Work Area). Studies in human populations (epidemiologic and case studies) provide clear and consistent evidence that benzene exposure causes acute myelogenous (nonlymphocytic) leukemia (AML) (see EPA risk assessment for benzene).

Children at the school would be exposed to benzene (among other air pollutants, such as ethyl benzene, toluene, xylene, and Methyl Tertiary Butyl Ether) from a number of processes at the fueling station, including: during loading of gasoline into underground storage tanks, vapors from these tanks, refueling (gasoline vapors are emitted at the vehicle/nozzle interface), and when spills occur (CARB Risk Assessment Guidelines). A number of studies have reported that children living near gas stations are at increased risk of exposure to harmful air pollutants and at increased risk of developing leukemia (Morales et al., Correa et al., and Brosselin et al.). The EPA also cautions that children may have higher exposures to benzene in air (due to their heightened activity patterns and ventilation rates). This leads to potentially greater risk of

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leukemia and other effects to children, even if they are exposed at similar levels as adults (EPA Risk Assessment for Benzene).

For the reasons outlined above, it is clear that a gas station should not be located adjacent to a school. I appreciate that the City of Pflugerville welcomes meaningful public involvement and look forward to speaking with the Planning and Zoning Committee and City Council at the upcoming sessions. Our family joins Mayor Coleman in his goal to "...encourage economic development while maintaining Pflugerville's small town atmosphere."

Sincerely,

Stephanie Shirley

Resident - Pflugerville, Texas

9/19/2016

References:

1. Brosselin et al. 2009. Acute childhood leukaemia and residence next to petrol stations and automotive repair garages: the ESCALE study (SFCE).
<http://www.ncbi.nlm.nih.gov/pubmed/19213757>
2. California Air Resources Board (CARB) Risk Assessment Guidelines:
<https://www.arb.ca.gov/ab2588/rrap-iwra/gasiwra.pdf>
3. California Air Resources Board (CARB) Handbook: <https://www.arb.ca.gov/ch/handbook.pdf>
4. Correa et al. 2012. The impact of BTEX emissions from gas stations into the atmosphere.
<http://www.sciencedirect.com/science/article/pii/S1309104215304384>
5. US Environmental Protection Agency (EPA) School Siting Guidelines:
<https://www.epa.gov/schools/school-siting-guidelines>
6. US Environmental Protection Agency (EPA) Risk Assessment for Benzene:
<https://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=2806>
7. Institute of Traffic Engineers (ITE): <http://www.ite.org/tripgeneration/trippubs.asp>
8. Morales et al. 2010. Assessing the impact of petrol stations on their immediate surroundings. <http://www.ncbi.nlm.nih.gov/pubmed/20810207>
9. University of Michigan Sound Level Database:
<http://multimedia.3m.com/mws/media/888553O/noise-navigator-sound-level-hearing-protection-database.pdf>
10. National Institute of Health (NIH) Publication No. 14-4233:
<https://www.nidcd.nih.gov/health/noise-induced-hearing-loss>
11. US Federal Bureau of Investigation (FBI): <https://ucr.fbi.gov/nibrs/2014>

Emily Barron

From: Karen Thompson
Sent: Friday, September 16, 2016 8:51 AM
To: Brandon Wade; Trey Fletcher; Emily Barron
Cc: Hazel Sherrod
Subject: FW: Rezoning at Falcon Pointe / Hidden Lakes
Attachments: image001.jpg

Copying Hazel to retain with zoning records.

Thanks,
Karen

From: Jeff Coleman
Sent: Thursday, September 15, 2016 3:54 PM
To: Karen Thompson <KARENT@pflugervilletx.gov>
Subject: Fwd: Rezoning at Falcon Pointe / Hidden Lakes

Sent from my iPhone

Begin forwarded message:

From: Nancy Gomez <[REDACTED]>
Date: September 15, 2016 at 3:52:25 PM CDT
To: "mayor@pflugervilletx.gov" <mayor@pflugervilletx.gov>, "council1@pflugervilletx.gov" <council1@pflugervilletx.gov>, "coucil3@pflugervilletx.gov" <coucil3@pflugervilletx.gov>, "coucil4@pflugervilletx.gov" <coucil4@pflugervilletx.gov>, "mike.heath@pflugervilletx.gov" <mike.heath@pflugervilletx.gov>, "jeff.marsh@pflugervilletx.gov" <jeff.marsh@pflugervilletx.gov>
Cc: [REDACTED]
Subject: Rezoning at Falcon Pointe / Hidden Lakes

Dear Respectable and honorable Mayor and City Council Members

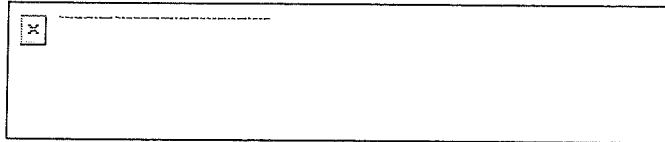
This email is in regards to the proposal of rezoning at the corner of Pflugerville Parkway and Colorado Sands Parkway at Falcone Point. I am respectfully requesting, as a resident of Pflugerville and Parent with children at the Primrose School of Pflugerville at Falcon Pointe 17721 Colorado Sands Parkway Pflugerville, TX 78660, that the proposed use of land for that area be denied. I truly believe that this proposed use is not in the best interest of the parents of the children at this school nor is in the best interest for those of us who are residents of the Hidden Lakes and Falcone Pointe community since this proposed use for a gas station would only create more traffic. This would not only be inconvenient during peak

commute times but also create the safety hazard for my children who attend the Primrose School of Pflugerville. I hope the City of Pflugerville takes into the account the negative impact this would cause and the threat to safety for the children.

Please respectfully note my disapproval of this measure.

Best Regards,

*Nancy Gomez
Paralegal*



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1214 East 7th St.
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**"BEING YOUR VOICE IN ADVERSITY
THROUGH THE PURSUIT OF
JUSTICE, MERCY & RESTORATION"**

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Emily Barron

From: Karen Thompson
Sent: Friday, September 16, 2016 8:51 AM
To: Brandon Wade; Trey Fletcher; Emily Barron
Cc: Hazel Sherrod
Subject: FW: Pflugerville Zoning for Gas Station next to Primrose Pre School

Copying Hazel to retain with zoning records.

Thanks,
Karen

From: Jeff Coleman
Sent: Thursday, September 15, 2016 3:56 PM
To: Karen Thompson <KARENT@pflugervilletx.gov>
Subject: Fwd: Pflugerville Zoning for Gas Station next to Primrose Pre School

Sent from my iPhone

Begin forwarded message:

From: JS <jsstewart@pnuo.com>
Date: September 15, 2016 at 12:44:50 PM CDT
To: <jsstewart@outlook.com>
Subject: Pflugerville Zoning for Gas Station next to Primrose Pre School

Dear Respectable and honorable Mayor and City Council Members

As a resident of hidden lakes I don't believe that a gas station sharing the parking lot of a preschool Primrose School of Pflugerville at Falcon Pointe 17721 Colorado Sands Parkway Pflugerville, TX 78660 is the safest situation for the children who walk in the parking lot during drop off and pick-up times. I have two kids that attend that school and the parking lot is exceptionally busy from 7-9 am and from 4-6 pm. These would also be the peak hours for traffic to the gas station, I hope you can support using this land for another use that doesn't endanger my children.

Please respectfully note my disapproval of this measure.

Thanks in advance

Jason Stewart

Erin Sellers

To: Hazel Sherrod
Subject: RE: Proposed gas station next to Primrose School

From: Karen Thompson
Sent: Monday, September 19, 2016 2:38 PM
To: Brandon Wade <brandonw@pflugervilletx.gov>
Cc: Hazel Sherrod <hsherrod@pflugervilletx.gov>; Trey Fletcher <TREYF@pflugervilletx.gov>; Emily Barron <EmilyB@pflugervilletx.gov>
Subject: FW: Proposed gas station next to Primrose School

From: Kevin LaHaise <[REDACTED]>
Sent: Monday, September 19, 2016 2:30 PM
To: Planning Department <PLANNING@pflugervilletx.gov>; citymanager <citymanager@pflugervilletx.gov>; Jeff Coleman <Jeff.Coleman@pflugervilletx.gov>
Cc: Cameron LaHaise <[REDACTED]>
Subject: Proposed gas station next to Primrose School

Members of the Planning and Zoning Commission, as well as other interested parties --

In advance of tonight's hearing, I felt compelled to share the (below-linked) study published by the Association of School of Public Health, US National Library of Medicine and the NIH regarding the location of daycare facilities relative to environmental hazards.

The report makes a compelling case for ensuring daycares are not located in areas that pose environmental risks to developing children, as their physiology makes them more susceptible to these toxins than adults.

The report specifically calls out gas stations as a facilities that raise concerns:

*"Sites that raise concerns include, but are not limited to, dry cleaners, smelters, mills, factories, **gas stations**, auto repair shops, landfills, U.S. Environmental Protection Agency (EPA) or state hazardous waste sites, rifle ranges, leaking underground storage tanks, and illegal drug labs."*

You can review the entire report at the below link, which also includes information on the SAFER program that was piloted in Connecticut to address environmental risks associated with daycare locations.

Making Child Care Centers SAFER: A Non-Regulatory Approach to Improving Child Care Center Siting

<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3072901/>

It is my sincere hope, as a resident of Pflugerville and a parent of two children that attend the Primrose school, that our appointed P+Z representatives will prevent a gas station from being built so

close to the daycare. The environmental risks to children are well documented and exhaustively studied.

I concede that our Planning and Zoning strategy is an essential part of economic development, but this report demonstrates how environmental hazards have repeatedly forced childcare facilities to close as a result of these risks. Even if we were to ignore the public health angle, the Primrose School is a much larger employer than the proposed gas station. Surely we can find a way to encourage development without damaging the businesses that have already invested in our community...

If the commission is unwilling to prevent the construction of this gas station, I implore you to hold the builders/owners to the strictest standards of environmentally-conscious development, with specific concessions made to the Primrose School on an annual basis, whereby environmental studies can be commissioned to ensure the health and wellbeing of students that attend Primrose.


I appreciate how hard the city works to manage Pflugerville's growth. These issues are always complex, and our town has growing pains, most certainly. But this gas station may just ensure our children do, too.

Please do not allow this gas station to be built on the doorsteps of a childcare facility.

Thanks for your consideration.

Cheers,
Kevin

--
Kevin LaHaise
Vice President — Jones-Dilworth Inc.
413.244.8994


@KevinL

Erin Sellers

From: Tina Burgio [mailto:tina.burgio@gmail.com]
Sent: Monday, September 19, 2016 4:18 PM
To: Erin Sellers
Subject: Gas Station Next to Primrose School

Hi Erin,

Thank you for speaking to me today. I know it's a challenging situation. I am a parent of children that attend Primrose and a resident of Pflugerville. While I cannot attend the meeting tonight, I'd like a chance to provide pertinent comments to be provided to the decision makers:

Health Concern:

- Children are outside year round for two hours a day at Primrose. The quality of the air to which they are exposed at a young age is important. In addition, some teachers/staff are outside more. A study shown here indicates a recommended minimum of 100 meters (328 ft) from a gas station to a vulnerable facility such as a school. (Not just from the fumes from the pumps, but also the pollutants from vehicles. Please read this short synopsis of the study.) - <https://www.sciencedaily.com/releases/2011/02/110204130315.htm>

Traffic Concern:

- The peak volume of traffic for a daycare and gas station is the same. (The beginning and end of the average work day.) A daycare parking lot is a precarious situation during drop-off and pick-up without traffic that's not sensitive to small children. Introducing traffic that's not attentive to small children is dangerous. We're not talking about the children old enough to know to look for cars or that can be easily seen themselves.

Quality Childcare Options / Successful Pflugerville Business:

- Primrose is a great school and an asset to our community. (Their location in Forest Creek, which has the same owners, is highly rated and has regularly been a candidate for "Round Rock Best of") The area of Pflugerville in question is saturated with young families with limited quality daycare facilities. (When looking for a daycare over a year ago there was a 6 months waiting list for all of the highly recommended daycare locations in Pflugerville. For perspective, the highly rated Round Rock daycares have 3 months waiting lists.) Sharing a parking lot with a gas station would almost immediately eliminate a daycare from a parent's list. The location of any business adjacent to the Primrose building will have a direct impact on their enrollment. The owner's of that facility made an investment in the area when building before full development plans had been designed. That shows their faith and dedication to our community. Consideration should be taken to help a Pflugerville business be successful.

Thank you advance for my last minute submission.

~Tina Burgio

