

The Project Olive Amazon warehouse proposal is a 24/7 distribution center of almost 4 million square feet with acres of paved surfaces to which constant vehicular traffic will be occurring on the premises and on all the roads leading up to the site. The vehicles will be tractor trailers, utility vehicles and passenger vehicles and they will be using the roads and the site 24/7. The proposal estimates the numbers of the vehicles per day, which amounts to hundreds per hour with constant non-stop traffic, and also notes an increase in traffic that will occur during the holiday season. The emissions originating from the movement of the vehicles does not take into account the number of hours of cumulative idling by the engines on the site waiting to park, waiting for loads, and waiting to leave the site.

With non-stop constant vehicular activities comes constant air pollutants and negative impacts to air quality, all of which are scientifically documented to be detrimental to human, animal and environmental health. Air pollution causes or exacerbates health conditions such as asthma, lung diseases, and cardiovascular issues. Studies have found links between air pollution and brain deterioration, stunted development and behavioral changes. The micro-particulate levels produced in the emissions are one of the primary causes of asthma in children and a new study shows that the higher the level of particulates in the air, the greater the indications of psychological distress in people. Micro-particulates are produced in abundance when a cold diesel engine warms up. And we all know, there will be plenty of cold diesel engines warming up in a facility located in our climate.

It is worth noting that the New York State Vehicle Idle Restriction Law sets forth a five-minute limit for idling diesel trucks and buses but exempts vehicles when the temperature is below 25 degrees. Under this exception, all of the trucks at Project Olive would be allowed to idle for up to two hours. With all of the vehicles located in a concentrated area (hot spot), the loading of atmospheric contaminants would be significant. If Project Olive receives 1,000 trucks per day that would be equivalent to 5,000 minutes of idling time – assuming they follow these regulations, which are extremely difficult to enforce – for a total of 83.3 aggregate hours of air pollution. When adding the allowed winter season exemption, the potential for pollutant loading increases.

Studies conducted over decades have consistently shown how air pollution has negative health effects and impacts lives, and has also been noted in the local Peace Bridge truck traffic impact studies provided below:

(The links below could be deleted if you need to cut some of it!)

- American Journal of Public Health:
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1448429/>
- Public Med: <https://www.ncbi.nlm.nih.gov/pubmed/21913504>
- NYSDC Phase II Study Bridge Traffic, Air Pollution and Health Issue:
https://www.dec.ny.gov/docs/air_pdf/pbfinalreport.pdf

- Respiratory Health Peace Bridge Neighborhoods: <https://buffalonews.com/2012/09/12/researcher-decries-asthma-rates-near-peace-bridge/>
- UB Research Summary: <http://www.buffalo.edu/news/releases/2004/10/6941.html>
- Health Effects Institute: <https://www.healtheffects.org/publication/air-toxics-exposure-vehicle-emissions-us-border-crossing-buffalo-peace-bridge-study>
- Media story Peace Bridge Air Quality and Related Health Issues: <https://www.investigativepost.org/2013/05/25/asthma-epidemic-near-peace-bridge/>
- Traffic Equity Buffalo, New York: https://ppgbuffalo.org/files/documents/environment-_traffic_equity_in_buffalo__new_york.pdf

There are documented air quality issues at the Peace Bridge along with serious health issues related to vehicle emissions. The Project Olive Amazon warehouse will have many of the same air quality issues that led to the degradation of public health around the Peace Bridge plaza and highlights the many issues that have to be addressed, not the least of which is the control of diesel engine particulate matter.

The negative impact on air quality needs to be carefully evaluated to ensure that the public health of the citizens is not compromised by the emissions from diesel-powered trucks. From the documents provided on the proposal, it does not appear that Project Olive has given this important air quality issue much consideration. The Project Olive proposal also needs to provide plans to demonstrate how the warehouse will minimize engine idling and to ensure NYS agency regulations for vehicle emissions and air quality are followed and met.

Such an immense and busy facility placed near the center of the Island will not only distribute the air pollutants to the adjacent residential neighborhoods, but the pollutants will also be carried to the eastern portions of the Island as the winds predominantly originate from the west.

The Grand Island community deserves consideration for the safety of our health and that of the environment to which our *Natural Resources* are considered a priority in the 2018 Comprehensive Plan. **A comprehensive yearlong air quality study is needed for this proposal and the study should be done by professionals experienced in the collection of field data for applied models used to predict air pollution impacts.** To assess the air quality impacts, Project Olive needs to do a comprehensive air quality study that includes but is not limited to the following:

- Conduct an air quality study in which data are collected over a one year period taking into account seasonal climate variation, wind patterns, other physical effects like thermal inversions that can adversely impact air quality and the loading that is expected from traffic moving at speed or congested along the adjacent Route 190 corridor
- Disclose with specificity the expected number of diesel and gasoline powered vehicles using the facility daily including any that are using less polluting alternative fuel sources.

This includes all bulk delivery vehicles as well as daily delivery vehicles and the vehicles brought onto the site by employees.

- Assess meteorological conditions and provide a comprehensive model defining air quality expectations during the four seasons of the year.
- Model air quality based on traffic patterns, traffic volume, wind, weather conditions and other factors - the wind will carry vehicle emissions and air pollution throughout the nearby area and downwind
- Identify the scope and magnitude of the “emission hotspot” established by the day to day operation of Project Olive and the downwind neighborhoods (including their population makeup) that are downwind of the project.
- Assess air quality impacts during discrete meteorological events like thermal inversions or periods of aerodynamic downwash or aerosol distribution and analyze the potential adverse health-related effects during the localized thermal inversions that often occur along the Niagara riverfront. (These are the same localized phenomena that trapped and held toxic benzene emissions from Tonawanda Coke in the nearby neighborhoods, including Grand Island)
- Commit in writing to methods, best management practices or treatment equipment options that would curtail emissions or collect and filter pollutants while vehicles are loading or unloading at Project Olive.

Research has shown that the operations involved with Project Olive will negatively affect the health and well-being of the people and the environment of Grand Island. The Town officials need to address this serious and long-lasting impact on the community.

Sincerely,

Sean Christian (Bubba) Rustowicz