

October 18, 2005

Berkeley City Council
2180 Milvia Street
Berkeley, CA 94704

RE: Item 38. Gilman Street Playing Fields - MITIGATIONS

Please consider this request for six (6) additional mitigations to the Gilman Street Fields project as follows:

1. Air Quality Study at Gilman Street

The purpose of the Gilman Fields Air Quality Study is to measure the levels of PM2.5 and PM10 so that community members can make informed decisions on using the Park's facilities.

The City of Berkeley should monitor particulate matter (PM*) in the air at the proposed Gilman Street site for at least one continuous year. Each month, air quality reports should be posted to the City of Berkeley website in .pdf and spreadsheet format (as was done with the Harrison Park air study).

2. Wind Rose

In addition to the particulate data, wind speed, wind direction, and ambient temperature should also be recorded. All data should be collected on a one-hour average basis.

3. Noise Study

The Gilman Street project should be required to conduct an onsite, yearlong noise study concurrently with the air study. Site levels are reported to be quite high and warrant more investigation.

4. Disclosure to Parents and Adult Users

All parents of children participating in games at the Gilman Street Recreational Facility, and all adults participating in these games shall read, sign and return a disclosure form to the City of Berkeley. This disclosure form should indicate that the signer understands:

- The fields are in an area designated for industrial use.
- It is the policy of the City of Berkeley and the operator of the playing fields not to interfere with manufacturing and other plan-conforming businesses in the area.
- There may be large trucks, noises, odors in this area as a normal and lawful condition of industrial operation.
- Air quality on site may be of concern and the City of Berkeley is studying this potential problem.

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5. Environmental Contingency Fund

Require that the project create a Gilman Street Playing Fields contingency fund of at least \$30,000 to be used to defray the City of Berkeley staff costs to respond to complaints.

6. Revisit the Health Risk Assessment

The data from the yearlong onsite monitoring should be used to develop an updated health risk assessment for the Gilman Street project.

Sincerely,



L.A. Wood

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* PM is a measurement of particles per cubic meter of air. Particles are measured in two primary size fractions, less than 2.5 micrometers (PM 2.5) and 2.5 - 10 micrometers (PM 10). Fine particles, less than 2.5 micrometers in diameter, are mainly produced by combustion or burning activities such as fuel burned in automobiles, factories, fireplaces, and wood stoves. Coarse particles, less than 10 micrometers in diameter, usually arise as a result of natural processes such as wind-blown dust or soil. When inhaled, these particles may be harmful to persons with asthma and other respiratory problems. (source: City of Berkeley web site)

Berkeley's Freeway Sports Fields

By L A WOOD

Who in their right mind would ever think to create a sports field on the shoulder of an interstate freeway that is often in gridlock and whose daily auto capacity exceeds 250,000 vehicles? It seems no one, except the City of Berkeley, which is now proposing the Gilman Street "Freeway Fields." As it turns out, the site designated for this recreational facility is connected to the East Shore Regional Park. Unfortunately, it is that narrow portion that is directly adjacent to I-80, separated from the busy highway by only the frontage road and a chain link fence.

The city, which is both the project developer and the permit regulator, has dismissed the site's undeniably bad air quality. Planners have been less than honest about the potential health impacts to the Freeway Field users, the majority of whom are children. The Gilman Freeway Fields, like a number of other West Berkeley projects, has created serious conflicts over air quality and land use. The Gilman Street project is the most extreme example. Berkeley's proposal to build five sports fields at this site throws all caution to the wind in the hope that the wind will literal-

ly blow the right way.

Upwind and Downwind

Anyone who has visited the proposed site knows that during every season of the year, there are days, and even periods of each day, when there is no wind or when it blows west, towards the bay. So, it may come as a surprise that the city's project consultants have argued that the Freeway Fields would be upwind from auto and industry emissions when the fields are in use.

Although the city's consultants acknowledge there are days when the fields would have no wind, or would be downwind, from freeway and industry pollution, the health risks were assessed as if the proposed fields were only impacted by bay winds. This conveniently avoids any discussion of the health consequences for those children on site during the times when freeway and industry emissions do impact the proposed location. What annual percentage of days with emissions permeating the fields is acceptable from a public health perspective? Ten percent? Twenty percent? Thirty percent? More? Park users have a right to know what the real health impacts are!

The Freeway Fields project has moved

through city planning without provoking as much as a whimper from the planning commission or staff about the site's poor air quality. Perhaps it is because the mayor has placed the Freeway Fields on his "progressive" agenda. Certainly project consultants must be aware of the political pressure to make the project work. This is city planning at its worst. In a more normal rezoning process where the developer isn't in the cozy position of also being the permit regulator, such a significant change in land use would require scientific proof about the health and safety of the site.

Land Use and Children

Some in Berkeley may remember the fiasco surrounding a similar project several years ago. The Harrison soccer fields, not far from the proposed Gilman Street site, were suspected of having poor air quality. However, like with the Freeway Fields now, the city argued for the rezoning of the Harrison site based on the idea that the air quality wasn't that bad, providing children

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Freeway Sports Fields

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didn't spend too much time there.

This notion was also supported by the city's public health officer who publicly stated that the benefit from recreation outweighed any health concerns. The city must have been dismayed when the onsite air monitoring of the Harrison soccer fields revealed a much more extreme picture. The PM10 particulate matter was shown to exceed the state's health standards more than 100 days a year, forcing the city to post the soccer site with health warnings!

The California State Air Resources Board (ARB) recently updated its land use guidelines for new sensitive land uses, including those associated with congested freeways (100,000 vehicles/day). The ARB identifies playfields at the top of its list of sensitive land uses, and clearly states that locating playfields in high traffic freeway emissions areas should be avoided.

There are numerous studies confirming the association between highway emissions and respiratory problems, including asthma and bronchitis. These problems are all of potential concern at the Gilman site, especially for those already at risk. Before the Freeway Fields are constructed, the City of Berkeley needs to understand more about the site's exposure levels from both mobile and stationary sources of air pollution.

Unquestionably, Interstate 80 is at its worst during the late afternoon, and is often in a total gridlock for hours. Because the fields would be used the most during the weekday afternoon commute, the worst air emissions would occur when the most children are exerting themselves on the playing fields. And it won't get better. Freeway traffic and auto emissions at this air quality "hot spot" are only expected to increase.

For those who believe that the Gilman Freeway Fields are sufficiently buffered from air pollution sources at a mere 500 feet or less from I-80, they should be aware that a study released this year by the California Office of Environmental Health Hazard Assessment and the California Department of Health Services suggests that concentrations of freeway emissions can impact downwind receptors up to 1500 feet before diminishing to background levels. That amounts to five football fields, end to end.

With the promise of millions of dollars coming from the state's Department of Parks and the East Bay Regional Parks District, the City of Berkeley will certainly move forward to build the Freeway Fields. Why haven't these agencies, which are in the business of parks, voiced their concern over sports fields being sited on a congested freeway exit? The city should be required to monitor the air quality on site for at least a year before development of the proposed sports fields. Not to do so is irresponsible, and perhaps criminal!