

I read with interest your Opinion piece this morning on the Coal Tar Sealant issue. You suggest that one more visit from the USGS Scientist that has been central to the push to ban coal tar sealants would be beneficial for the Council in order for them to act on the proposed Resolution. I seem to be the only person out in the community concerned about this highly focused effort to target only one of many sources of pollution facing our environment. Perhaps I am the only one out here willing to stand up and speak out. In any event I think that continued forums on this will not bring any new information to the table but instead it could tend to confuse and muddy the issue. I got involved in this effort and have spent an inordinate amount of time learning about PAHs and in particular coal tar sealants. I wrote a quite lengthy email message on it that I sent to Council which tried to explain in plain English "What I have learned about Coal Tar Sealants" (I will forward it to you separately if you want to post it somewhere). It has not been posted on the City website while other "pro ban" treatises have been.

While I appreciate that everyone means well in this effort and they think they are doing the right thing, I feel that we need to step back and take a bigger view of the issue. What are we really concerned about? Our environment and public health. What should we be doing to protect our environment and our health? The first thing we need to do is to recognize that there is no evidence of any compromised waterways in this community as a result of coal tar PAH sources. None. There is no health hazard identified directly relating to coal tar sealants. The PAHs in coal tar sealants are not "known carcinogens".

We also know that there are many sources of PAHs in our environment and it has been proven that the majority of them come from sources other than coal tar sealants. Simply removing coal tar sealants from the pollution stream will not solve the problem. The problem will be solved by managing all of the sources of pollution using storm water management best practices. We need to embrace low impact development, we need to minimize the use of end of pipe storm water management practices. We need to manage our storm water at the source and enhance our storm water quality efforts (both on the private development side and on the City side). We need to stop requiring acres of parking and instead rewrite our zoning regulations to allow the businesses to provide the proper amount of parking they need for their business. Reduce impervious surface, increase our ability to catch and retain the storm water (and pollutants) on site localized and then carefully manage the runoff that does occur using vegetated bio-swales and other techniques.

The Council Resolution needs to address the bigger issue and should not focus on just coal tar sealants. It needs to talk about water quality, storm water management and measures we can take to deal with all pollutants out there. Bringing a USGS Scientist in to defend her work targeting coal tar sealants as "the problem" is not going to be productive. The coal tar industry has it's own scientists who refute much of her work. Do we need to host more debates or do we need to move forward, acknowledge all the pollution sources out there, acknowledge our inability to remove all sources and address things we can do to manage and minimize the pollution.

Geoffrey H. Butler AIA, President/CEO
Butler, Rosenbury & Partners, Inc.