

ENVIRONMENT AND ENERGY CONSERVATION COMMISSION

c/o Department of Environmental Services
2100 Clarendon Blvd., Suite 705
Arlington, VA 22201
March 11, 2014

The Honorable Jay Fisette, Chairman
Arlington County Board
2100 Clarendon Blvd., Suite 300
Arlington, VA 22201

Dear Mr. Fisette,

The Environment and Energy Conservation Commission (E2C2) is aware of controversy surrounding the implementation of capital improvements -- including the new parking/drop off area and the associated Manchester Street access, increased size of the stormwater management facility and access compliant with the American's with Disabilities Act (ADA) -- at Ashlawn Elementary School. At our January 2014 meeting several members of the public testified or provided written comment to E2C2 raising concerns about tree removal and excavations resulting in impacts to light, noise, and changes in neighborhood character in excess of what they were led to believe would occur. Representatives of Arlington Public Schools (APS) and their contractors presented information on the project and changes that occurred during its detailed design and construction phases.

The APS worked through the Building Level Planning Committee (BLPC) and the Public Facilities Review Committee (PFRC) processes last year and completed an Environmental Assessment (EA) during the planning and initial design phases. E2C2 reviewed that EA and provided input to the County based on that document. E2C2 raised significant concerns about traffic and associated environmental impact related to the new Manchester Street parking/drop-off area but generally supported the addition to Ashlawn because of its energy conservation and green building features.

In January, we learned from APS that increases in impermeable pavement due in part to ADA design requirements triggered the need for changes to the design of the stormwater management system, which in turn resulted in removal of additional mature trees, one or more of which may be in the Resource Protection Area (RPA) for Four Mile Run. We understand that APS proposes to replace those trees with a larger number of younger, smaller native trees that will grow relatively quickly (i.e., in 5 to 10 years) to replace the environmental and quality of life services provided by the mature trees. Ensuring the integrity of the RPA is of key interest of E2C2. After APS's presentation to E2C2, we reviewed the APS January 27, 2014 update of the EA and reviewed the SHW Group presentation to the PFRC (February 19, 2014).

Recommendations regarding the Ashlawn Environmental Impact Assessment

Public comment provided to E2C2 demonstrates concern about the completeness and accuracy of the updated EA; E2C2 does not have the capability to investigate and arbitrate those issues and believes that it is APS's responsibility and in APS's best interest to respond to public comment on the EA in an additional updated EA.

Despite the controversy surrounding aspects of the project, the EA still provides only vague conclusions about impacts to the RPA (e.g., “minimal site disturbance”) and vague promises (e.g., “maintain vegetation to the maximum extent possible”). Likewise, the EA does not clearly address a key neighborhood concern regarding light glare resulting from topography, foliar density and height changes. While the EA commits to using Dark Sky compliant lights, it does not address lateral glare; it shows how vegetative cover will look from the side when trees are fully leafed out (May - October) after 5 and 10 years of growth but does not address whether there will be light impacts for the first 5 to 10 years. APS missed an opportunity to use the EA process to document the difficult environmental tradeoffs it considered, including the benefits and costs of alternative approaches, and what means were explored to minimize and mitigate impacts. From the EA, it is not clear which alternatives were explored to reduce impermeability, lessen the need for underground stormwater systems, and minimize impacts to trees. Through a more thoughtful approach to the EA, APS and the County could have enhanced -- and still have an opportunity to enhance - transparency to re-establish trust and reduce controversy.

Recommendations regarding the County’s Environmental Impact Assessment Process

This EA and project point out two shortcomings of the APS and the County’s approach to EAs. First is the checklist approach to EAs: while quick, it is insufficient to document alternatives analysis. Second is a question of timing: E2C2 prefers that EAs be prepared early in planning and submitted to us so that we, and the public, may understand and influence larger scale, fundamental planning issues. More often than not as plans evolve into designs -- and sometimes even during construction -- important environmental considerations arise. Therefore we believe a pre-construction EA should be completed when a review of the planning phase EA confirms it is no longer an accurate reflection of the plan and its impacts. Furthermore, we recommend that the County review its EA practices and training for staff to ensure that the EA remains a valuable tool for making transparent decisions informed by experts and the community. E2C2 stands ready to work with you and County staff to resolve these issues.

Lastly, we were pleased to hear from APS staff that they are already applying some of the lessons they have learned from their missteps as they are taking actions on their other capital improvement projects to improve designs, conduct impact assessments earlier, increase transparency, and avoid similar controversies. We look forward to working with APS to provide timely advice and input to its plans.

Sincerely,



Scott Dicke
E2C2 Chair

cc: APS Board
John Chadwick
Scott Prisco
Jennifer Xu
Cathy Lin

