

ENVIRONMENT AND ENERGY CONSERVATION COMMISSION

c/o Department of Environmental Services

2100 Clarendon Blvd., Suite 705

Arlington, VA 22201

August 24, 2015

The Honorable Mary Hynes, Chair

Arlington County Board

2100 Clarendon Boulevard, Suite 300

Arlington, VA 22201

Re: Abingdon Elementary School Expansion Environmental Assessment

Dear Ms. Hynes:

The Arlington County Environment and Energy Conservation Commission (E2C2) was pleased to provide representation on the Public Facilities Review Committee for the Abingdon Elementary School (ES) Expansion and conduct a review of the Environmental Assessment. E2C2 recognizes the many factors under consideration during the concept and schematic design process, including accommodating the growth in the Abingdon ES student population, functionality for school activities inside and outside the building, shared community use of the school property outside school hours, preservation of existing green space and trees, pedestrian and vehicle traffic management (on-site and off-site), parking for teachers and visitors, emergency response access, stormwater management, building energy management, and respect for the character of the neighborhood. Plan options included trade-offs among environmental impacts, pedestrian and vehicle safety, and school functionality, and we appreciate the efforts by Arlington Public Schools (APS) to balance these many factors.

Based on our review of the July 2015 EA and APS' presentation at our July E2C2 meeting, our comments below are generally supportive of the proposed Abingdon ES expansion plan, but we do have some concerns, particularly with regard to parking, stormwater management, tree removal, energy conservation measures, and the overall APS planning process.

**Parking & Traffic** - During the schematic design phase, we were particularly concerned about the calculated increase in required parking spaces (total of 98 compared to the existing 78 spaces), even after accounting for off-site parking and Transportation Demand Management (TDM) initiatives to encourage transit and carpooling. We appreciate that the number of on-site spaces is increasing from 78 to only 83 because of the arrangement with Fairlington Villages to use 15 off-site spaces on their property. While we understand that the current plan's bus loop provide safer separation between bus and parent pick-up/drop-off traffic, we are concerned about the resulting loss of green space on the existing property, particularly the green space adjacent to the Courtbridge II condominiums and the green space and trees bordering the existing playfield. We encourage further considerations of the parking lot/travel lane design (e.g., narrower spaces for compact cars) that could restore some of these areas, which would also reduce the amount of stormwater runoff. Additionally, in their schematic design, APS has included an alternate option to add 15 on-site parking lot spaces should the need arise in the future (e.g., the Fairlington Villages arrangement ends).

However, given the amount of community concern about the additional loss of green space, we recommend that if APS requires such a parking lot expansion in the future, there should be the opportunity for community discussion and evaluation of other options, such as increased TDM initiatives or a variance to account for more street parking spaces. Lastly, we disagree with the EA's conclusion that the project will not generate additional traffic – the expansion will result in additional vehicular traffic due to additional students, parents, and teachers.

**Bicycle and Pedestrian Access** - The EA mentions improvements at the perimeter of the school to facilitate bicycle and pedestrian access, which we endorse. Nearly a quarter (23%) of Abingdon ES students live within one-mile of the school and, even allowing for the relatively low expected bicycle travel from early elementary students, the current cycling rate (0.5%) is disappointingly low. The proposed infrastructure improvements — ADA compliant curbing, additional bike parking spaces, and proposed additional bike lanes on some streets, among other measures — should help promote neighborhood cycling to schools. In addition, during the PFRC meeting, we learned about several other county projects in the neighborhood that will further improve the bicycle and pedestrian infrastructure surrounding the school, and we would like to see those projects prioritized so that they are implemented in parallel with the planned APS improvements.

### **Impervious Surfaces / Stormwater Management**

- We support the use of permeable surfaces as an alternative to impervious pavement for the renovation of the on-site track and the widened emergency access path south of the school, which are currently mainly paved asphalt. This will help to offset the loss of pervious surfaces (e.g., grass) due to the building additions. The track and access path will be heavily used by pedestrian traffic (particularly the access path) and demonstrates the feasibility of incorporating permeable surfaces in construction and renovation projects. Their use should be encouraged for other APS and County projects as a means to improve stormwater management. At our July 2015 meeting, APS indicated that it was working on a plan for ongoing maintenance of pervious paving at Abingdon. E2C2 concurs that there should be a plan and budget to ensure long-term maintenance of pervious paving or it will not function as designed; this concern has been raised with other projects.
- We have heard a number of concerns raised by residents in Courtbridge II and Fairlington Villages regarding existing poor drainage on and near the School property following storm events and concerns about the performance of the future stormwater system. We recommend that APS conduct performance evaluations on a regular basis to ensure that the stormwater bio-retention areas perform as designed and ensure that plans are effectively communicated to the public. Further, while the stormwater management system design may meet current requirements, we are concerned that in light of increasingly stringent stormwater requirements over time, the current design may hinder APS' ability to comply with future revisions to their municipal separate storm sewer system (MS4) permit in the 2019-2024 permit cycle. For example, the stormwater management system achieves a phosphorus load reduction of 2.53 lbs per year, while the target is 2.50 lbs per year, though this accounts for the potential addition of 15 on-site spaces in the event that APS loses access to the Fairlington Villages parking lot. If these spaces are not built, there will be greater phosphorous load reductions, though these figures were not provided to E2C2.

**Erosion and Sediment Control** - In light of recent difficulties in the construction and operation of erosion and sediment control during the ongoing renovation at Ashlawn Elementary School, the significance of careful soil and surface water management during a construction project of this magnitude cannot be overstated. We are particularly concerned

about this issue because, as the EA acknowledges, the site is located within a Resource Management Area, the site slopes steeply behind the parking lot and school, and the total soil disturbance during construction is quite large (4.75 acres). APS should ensure that the erosion and sediment control plan is appropriate for the site and that it meets all requirements. APS is responsible as owner that all E&S provisions are implemented properly, with DES as the enforcement body, and that the off-site environment is protected throughout the construction and post-construction process. Proper contractual provisions should be provided that would allow APS or Arlington County DES to stop work at any time and require the Contractor to take any steps necessary to protect off-property land and water bodies, and APS informed us in July that they have taken steps to update contract language and improve control over contractor performance. We commend APS for adapting their processes and hope to see the E&S plans and public outreach plans implemented effectively (especially when there are significant deviations from plan).

**Tree Removal** – The EA indicates that of the 478 trees (with a diameter greater than 3 inches) on the site, 152 trees will be removed and 6 trees will be transplanted. Because of concerns at other APS project (e.g., Ashlawn), we recommend that APS provide example views from the neighborhood for the initial years (e.g., Years 0-5) following project completion to accurately reflect the canopy and height of newly planted trees. We recommend that APS provide E2C2, the Urban Forestry Commission, and the community an update if there are any significant changes to the number or type of trees removed.

**Energy Conservation** – Due to project budget, it appears that on-site renewable energy generation, like solar power and geothermal wells, were found to be infeasible options. Even if these are not current options, we recommend a conscious effort to ensure that this project's design choices retain the potential to accommodate renewable energy (e.g., space, orientation be considered for solar panels on the roof, and space for hardware be preserved in the electrical closet). We are pleased to see that high efficiency HVAC units and condensing boilers will be used on the new addition and for replacement units. While the budget will not allow for the implementation of energy efficiency measures throughout the existing building, APS has attempted to systematically evaluate the measures to identify the most cost-effective ones. It appears that there is still some “low-hanging fruit” that would offer energy (and cost) savings down the road. As such, we recommend the continued tracking of these “add alternatives.”

**Field Grass and Lighting** – Based on the EA and APS presentations at the PFRC meetings and E2C2 meetings, it is our understanding that the playfield is not large enough to be a regulation-sized sports field, and that APS has no intention of changing the field's current use. However, community members have expressed concern to us about the possibility of future artificial turf and/or field lights at the playfield. We recommend that APS provide E2C2 an update if there is any such proposed change to the field.

**Planning to Accommodate Future Growth** - E2C2 has been a strong advocate of building “up, not out”, and we support the proposal of a three-story addition to the back of the school, which will be in keeping with the 2- to 3-story multi-family homes in the neighborhood and mitigate the loss of further green space. However, we are concerned about the continuing capacity crisis and delays in identifying a new location for another South Arlington ES. Additionally, in May APS Superintendent Patrick Murphy proposed seven trailers on Abingdon ES's property for the 2019-2020 school year, just within 2 years of the completion of the new addition in Fall 2017. Given that the 3-story addition appears like a 2-story addition because of the lower grade at the back of the school, we recommend the addition's design and construction account for the potential to add a fourth floor in the future. Planning ahead now would save money and time and provide more flexibility to other APS ES projects. We are concerned that we will need to revisit an expansion to Abingdon ES or

another school in just a few years, and at that time, there may be more pressure to build on green space. This has been a common theme with other APS projects, and we urge the County and APS to work together to think strategically about how to best utilize upcoming school expansion projects to address the capacity shortage.

We appreciate this opportunity to comment on the draft EA. We look forward to working with you and County staff to help ensure the timely construction of yet another addition to Arlington's public schools.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Dicke". The signature is fluid and cursive, with a prominent initial "S" and a long, sweeping underline.

Scott Dicke  
Chair