

ENVIRONMENT AND ENERGY CONSERVATION COMMISSION

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

March 28, 2017

The Honorable Jay Fisetto, Chair
Arlington County Board
2100 Clarendon Blvd.
Arlington, VA 22201

Re: Request for Revised Environmental Assessment for Williamsburg Field Lights

Dear Mr. Fisetto:

As you are aware, the Williamsburg Field Site Evaluation Work Group (Work Group) recently completed its final report. That report responds to the County Board's charge that the Work Group evaluate whether or not to light the synthetic fields at Williamsburg Middle School. According to the charge, the evaluation must address "whether the environmental, noise and light spillage" effects of the lights can be mitigated sufficiently to preserve neighborhood character and provide a reasonable quality of life to the nearest neighbors. Among the consensus recommendations made by the Work Group to the County Board is that "County staff should prepare a revised Environmental Assessment (EA) prior to the Use Permit Amendment hearing by the County Board with sufficient time to allow for review by E2C2." According to the Work Group's report, "E2C2 is charged with advising the County Board specifically on [environmental impacts] and the Board would certainly benefit from such advice when deciding whether or not to light the fields."

E2C2 agrees that an EA is appropriate. To allow sufficient time for E2C2 review prior to the Board's meeting on the Use Permit in May, we request that a revised EA be made available sufficiently in advance of the E2C2's April 24th meeting to permit E2C2 to schedule a public meeting at that time and prepare, as appropriate, written comments.

History: The timing of an EA for field lights has had a long history with Arlington Public Schools (APS) and with E2C2. When the EA for the new elementary at the Williamsburg site (now known as the Discovery Elementary School) came before E2C2 for review in 2013, Commission members raised concerns about the absence of any discussion of field lighting effects and mitigation. APS took the position that, since lights were not included as part of an approved "project," discussion in the EA was neither necessary nor appropriate. In its July 2013 response to the EA, the Commission stated that "if the County decides to move forward with plans for synthetic turf fields," E2C2 expects to "be informed of plans for synthetic turf soccer fields and associated lighting in the Williamsburg neighborhood, and to receive a draft EA for review."

During the deliberations of the Work Group, the issue of an EA periodically arose. The consensus of the Work Group was that an EA could help inform the process and, ultimately, facilitate a well-reasoned and thoroughly supported County Board decision. Although APS continued to take the position that an EA was premature until the County Board approved a lights project, in late March 2016 it did prepare a draft EA together with a proposed schedule for E2C2 review. The draft EA was to be posted on the Work Group web-site on April 13 with a public meeting to be held by E2C2 on April 25th.

Work Group members expressed surprise with the condensed schedule and also with the preparation of a draft EA while many technical questions remained outstanding. APS agreed to withdraw the draft EA but has not reached a final decision on whether (1) a revised EA would, in fact, be prepared; or (2) the timing of an EA. Among Work Group members, the expectation was that an EA would be prepared following completion of Work Group deliberations.

Discussion: Regulation 4.4 requires that an EA discuss “alternatives to the project, including any impacts of not doing the project.” Consideration of the “no action” alternative would seem to serve little purpose if the analysis is conducted only after the project is formally approved. We also appreciate APS’s willingness to prepare a draft EA during 2016 and understand that Work Group guidance on the timing of an EA has not always been perfectly clear. The Work Group’s goal has been to request an EA when it would be most useful. Given the amount of technical review and data analysis conducted during Work Group deliberations, it ultimately became clear that an EA would benefit significantly from the Work Group’s final report, which was made available on February 28th.

In any event, the consensus of both the Work Group and E2C2 is that an EA could help inform the County Board’s decision on this difficult and contentious issue. We also note that APS should not be significantly burdened by this request, since it prepared a draft EA last year and an update should require relatively little additional staff time and resources — particularly in light of the analysis set forth in the Work Group’s final report. Accordingly, we request that a draft EA be prepared sufficiently in advance of E2C2’s April 2017 meeting to allow for public comment and Commission response to the draft.

Thank you very much.

Sincerely,



Christine Ng

Chair, E2C2