

**ENVIRONMENT AND ENERGY CONSERVATION COMMISSION**  
**c/o Department of Environmental Services**  
**2100 Clarendon Blvd., Suite 705**  
**Arlington, VA 22201**

March 25, 2019

The Honorable Christian Dorsey, Chair  
Arlington County Board  
2100 Clarendon Boulevard, Suite 300  
Arlington, VA 22201

**RE: E2C2 Comments on the Environmental Assessment for Benjamin Banneker Park**

Dear Chair Dorsey:

The Environment and Energy Conservation Commission (E2C2) was pleased to review the Environmental Assessment (EA) to renovate Benjamin Banneker Park. E2C2 agrees with the Department of Parks and Recreation (DPR) decision to draft the EA. E2C2 commends the work the design team has placed into the effort, minimizing impervious surface for trails to the greatest extent practicable due to site conditions, and not constructing improvements in the Resource Protection Area (RPA). They took many of E2C2's concerns voiced during the development of the framework plan, such as not increasing impervious surface for parking lot, and not expanding the dog park.

While the narrative style covered general items, there was a lack of specificity that E2C2 would like to better evaluate the environmental impacts. For example, we would like to see the square footage of additional impervious surface along with stormwater calculations for the selected stormwater management technique, and number of trees to be felled.

This letter addresses three issues: trail widening to balance safety with minimizing impacts to the environment, trees, and lighting.

1. Trail widening. Trail widening is increased from 8 to 12 feet, and from 8 to 10 feet on the bridge. The EA does not specifically state why this extent of trail widening is needed. E2C2 participated in drafting the bike element of the master plan, and generally is supportive of increasing cycling in the county. At some point widening must be weighed against the environmental impacts, such as tree felling, habitat loss, and increased impervious surface in the RPA. E2C2 recommends the DES and DPR work together to develop a specific policy on trail width under various use and environmental conditions to promote safety while providing the maximum protection to the environment. The Commission recommends that County staff explore alternative routings of the W&OD that would avoid the park. We feel strongly that the County should invest in biking infrastructure for this critical biking route outside the park.

1. Trees. The EA does not discuss the trees to be felled, outside of the total number of trees. Girth, age, condition, and species in the form of a tree inventory are important to determine the impact of the loss of tree cover.

2. Lighting. The EA mentions that light fixtures will be replaced with a newer version of an existing LED fixture. No discussion is made of the color temperature nor Dark Sky compliance of these fixtures. The County needs to select standards for trail lighting to minimize impacts to fauna. E2C2 has made this recommendation to other audiences, such as during a presentation of the Bicycle Element of the Transportation Master Plan.

In conclusion, E2C2 is always eager to review EAs, including the facts and figures behind the plans. We look forward to reviewing the additional information requested.

Respectfully,

A handwritten signature in black ink that reads "Mike Hanna". The signature is written in a cursive, flowing style.

Mike Hanna, Chair  
Environment and Energy Conservation Commission