

MVC draft staff report concerns

The Field Fund <thefieldfund@gmail.com>

Mon 10/19/2020 2:42 PM

To: Adam Turner <turner@mvcommission.org>; Alex Elvin <elvin@mvcommission.org>; Lucy Morrison <morrison@mvcommission.org>;

Cc: planningboard@oakbluffsma.gov <planningboard@oakbluffsma.gov>; Doug Ruskin <doug.ruskin@gmail.com>; Vicki Divoll <vicki.divoll@gmail.com>; T. Ewell Hopkins <ewellhopkins@mac.com>; Suzan Bellincampi <sbellincampi@massaudubon.org>; boneill@vineyardconservation.org <boneill@vineyardconservation.org>; rebecca@igimv.org <rebecca@igimv.org>; Samantha Look <slook@vineyardconservation.org>; Doug Finn <doug@scottenfinn.net>;

Dear Adam and Alex,

We have reviewed the current draft of the MVC staff report on the MVRHS athletic campus project and are concerned. Despite the environmental, human health, and financial implications associated with the application, there is very little acknowledgment or investigation of these issues.

From invoking the Dover Amendment against the Oak Bluffs Planning Board (and the stated possibility of doing the same to the MVC) to stonewalling the All Island Finance Committee's investigation into the long term costs associated with the project, the applicant has gone to great lengths to avoid close scrutiny of the proposal. As the body charged with overseeing projects of regional impact and protecting the island's water supply and preserving its rural character, it is imperative that the MVC conduct a thorough investigation into the proposal and its long term impacts. This drafted report falls short.

Expert testimonies have highlighted many fundamental flaws in the proposal — from the million dollar game field's incorrect size and orientation to the false claims around the plastic carpet's end of life disposal. And local leaders have called into question basic issues such as incremental development without master planning, false assumptions regarding the field usage numbers, and the toxic fire hazards associated with 2 rubber tracks and a massive petroleum-based carpet abutting the State Forest, among others. And yet none of these critical concerns are meaningfully addressed in the drafted report.

Further, as the draft report states, the proposed site is in the Lagoon and Sengetontacket pond watersheds and a Zone 2 wellhead protection area. And yet, there is no real inquiry regarding the use of maintenance chemicals and disinfectants for the proposed 2.5 acre plastic surface and what the impacts of those chemicals might be.

It is also problematic that the comprehensive PFAS testing necessary to determine the presence of the 5000+ PFAS chemicals — firmly recommended by Horsley Whitten, the environmental firm hired by the MVC to conduct a third party review — is being indefinitely postponed. Horsley Whitten has been adamant about the need for comprehensive testing, despite the applicant's objection to it. And yet, it seems the MVC is pursuing the far narrower approach put forth by the applicant. While it is true that TOP and TEO testing cost slightly more and are conducted at certain labs, we hope the MVC — and the MVRHS — agree that this is a very small price to pay when athlete health and indeed our water supply hang in the balance.

Hopefully you recall that a [Boston Globe cover story](#) last year highlighted the threat plastic fields pose to our water supply, finding that PFAS are used in the manufacturing of the

plastic fibers. [A letter from Ferraro Law Firm](#) -- the same firm that is representing the MVY Airport Commission in their lawsuit over PFAS contamination -- explicitly urged the MVRHS to avoid the use of plastic fields for these reasons. And yet strangely there is no mention of either of these realities in the draft report.

Finally, it is disheartening that so many significant letters (including those from many of the island's leading environmental organizations — VCS, IGI, MA Audubon Felix Neck, MV Environmental Educators Alliance — all expressing concerns about this application) were not only unacknowledged in Section 9, but are also unaddressed in the substance of the draft report. Given the nature of the emails, with many essentially copy and pasted and others extremely thoughtful, a simple tally of in support vs. opposed seems to be a disservice to the process.

Particularly with the massive quantity of materials relating to this application, we sincerely hope that the draft report can be amended to provide the commissioners with a more robust inquiry and accurate picture of the issues associated with it. While there is still time for public testimony, we hope everyone agrees that the integrity of the written record is important.

Sincerely,

Mollie Doyle, Dardy Slavin, and Rebekah Thomson
The Field Fund