

April 8, 2021

Ms. Joan Malkin, Chair
Martha's Vineyard Commission
PO Box 1447
Oak Bluffs, MA 02557

Re: Section 15 - DRI Benefits vs. Detriments

Dear Ms. Malkin & MV Commissioners;

On behalf of the Martha's Vineyard Public Schools, I wanted to take this opportunity to thank you and the Commission members for your thoughtful consideration in review of the DRI application for renovated athletic fields at the Martha's Vineyard Regional High School. This has been a thorough review, and we hope that you now understand the need for the improvements and the impact this project will have on a generation of MVRHS students to follow.

To ensure that we see this application in its full light we have spent some time working with representatives of the Martha's Vineyard Public School staff to better understand the findings required by your commission related to the benefits and detriments of the proposed project and any possible alternatives. The following are our collective thoughts as they relate to Sections 14 & 15 of the Act - DRI Benefits vs. Detriments.

As outlined below, the MVRHS project team would offer that the actual benefits of the proposed development far exceed the probable detriments, as evaluated in light of the considerations set forth in section 14(a) of the Act.

(a) Development at the proposed location is essential and especially appropriate in view of the available alternatives on the island of Martha's Vineyard;

Development of a new athletic complex at MVRHS is essential and especially appropriate given that this location presently serves as the central destination for students, athletes and the community at large on an island-wide basis. It is imperative that the Martha's Vineyard Regional High School provide education, recreational and athletic facilities within the confines of their existing campus. To move these proposed facilities to a different location on the island would create additional traffic on island roads, create expense in busing and transportation and extend the already long school day of our student athletes.

(b) Development in the manner proposed will have a more favorable impact on the environment in comparison to alternative manners of development;

The development of athletic facilities in the manner proposed will have a more favorable impact on the environment in comparison to available alternatives.

1. The products we have chosen to include in our proposal to the MVC have been thoroughly vetted by the MVRHS School Committee, our project team and the MVC's independent peer review consultants. The products are clean, safe and provide a healthy environment

for our student athletes. Many of the products selected are cradle-to-cradle certified and will be recycled at the end of their useful life.

2. We have documented that a synthetic turf field can accommodate the use of three (3) natural grass athletic fields. Should the MVC not allow the use of synthetic turf at the High School campus MVRHS would be forced to find locations for two (2) additional natural grass fields at the MVRHS campus. The only remaining areas available for development of natural grass athletic fields include Area #1 and Area #2 shown in Figure 1.

1. **AREA #1** consists of approximately 3.75 acres of existing forest at the south end of the existing running track. This area is not encumbered by Natural Heritage and Endangered Species Habitat areas, wetlands or other regulatory restrictions. This area was not originally designated for development due to its immediate proximity to the Deer Run Neighborhood and the fact that it would require clear cutting of existing mature forest.

2. **AREA #2** consists of approximately 6.00 acres of existing forest across Edgartown Vineyard Haven Road. This area is not encumbered by Natural Heritage and Endangered Species Habitat areas, wetlands or other regulatory restrictions. This area was not originally designated for development due to its location on the opposite side of the road, its immediate proximity to the Schoolhouse Village Neighborhood and the fact that it would require clear cutting of existing mature forest.



Figure 1 – Alternative locations for additional natural grass fields.



Should the MVC not allow the use of synthetic turf, the MVRHS's only viable alternative would be to pursue the construction of additional natural grass athletic facilities in one or both of these locations. Due to Title 9 requirements, these locations would likely have to include additional roadway access, parking, seating, sports lighting, irrigation and other associated site improvements. The cost of these expanded facilities has not yet been calculated but would likely exceed their available budget. The **MVRHS is NOT in favor of expanding into these areas**, and would instead prefer to use synthetic turf on one (1) field, as proposed.

3. The use of one synthetic turf field eliminates 264 pounds of nitrogen in the Lagoon Pond and Sengekontacket watersheds and reduces our present irrigation demand by 1,118,000 gallons of water per year.
4. Testing of the synthetic turf products has been conducted by the MVC's third party independent Licensed Site Professionals (TetraTech), and further reviewed by the MVC's environmental consultants (Horsley Witten). Here is what both peer review agents had to say regarding the results of that testing:

TetraTech – Synthetic Turf Laboratory Testing & Analysis Report – Feb. 26, 2021

1. Based on our review and the current regulatory standards for PFAS in Massachusetts, there are no significant risks associated with the discharge of PFAS from the synthetic turf field into groundwater. (Page 15)
2. "The PFAS6 compounds were not detected in the total PFAS analysis performed on the selected synthetic turf components. Therefore, no significant risks can be identified based on available data." (Page 13)
3. "... no significant risks from PFAS can be identified based on available data and regulatory standards." (Page 16)
4. "...no significant risks from fluorine can be identified based on available data and the EPA RSL." (Page 14)
5. "None of the metals detected in the total metals analysis of the various synthetic turf components were reported at concentrations above the MCP Method 1 S-1/GW-1 standard..." (Page 14)
6. "There are no excess risks associated with the total concentrations of metals in the synthetic turf components...." (Page 13)
7. "...no significant risk is associated with direct contact, incidental ingestion, and/or inhalation of these materials (Brockfill) in the synthetic turf components for these compounds." (Page 13)



8. "Therefore, there are no significant risks associated with direct contact, incidental ingestion, and/or inhalation of the Greenfield Turf..." (Page 13)
9. "Based on this evaluation, impacts from a theoretical discharge of antimony and other metals from the field to drinking water are de minimis." (Page 14)
10. The resulting mass of phenol that may leach from the synthetic turf field is significantly below the MCP RQ, suggesting potential quantities released to the subsurface are de minimis. (Page 15)
11. The resulting mass of benzyl alcohol that may leach from the synthetic turf field is significantly below the MCP RQ, suggesting potential quantities released to the subsurface are de minimis. (Page 15)
12. "...we believe our evaluation provides data to support that the overall risks to human health due to potential direct contact exposure to hazardous materials in or from the synthetic field materials are de minimis." (page 17)
13. "...none of the detected metals or compounds were detected in the leachate above the drinking water standards (MMCLs or MCP Method 1 GW-1) which would be applicable if the stormwater leachate from the field was being directly consumed." (Page 17)
14. "Based on the current understanding of PFAS using available analytical and risk assessment methods; elevated risk and environmental impacts from PFAS associated from the proposed synthetic turf field appear unlikely." (Page 17)

Horsley Witten – Synthetic Turf Laboratory Testing & Analysis Report – March 1, 2021

1. We agree with the (TetraTech) report conclusion that the overall risk to human health through a direct contact exposure with the field components is de minimis. (Page 5)
2. "Tetra Tech concluded that the estimated mass of antimony released to stormwater would be insufficient to result in detectable concentrations in groundwater downgradient from the proposed field above the comparison standards. HW does not disagree with this conclusion..." (Page 5)
3. "From a toxicology perspective, the analytical data supports the Tetra Tech conclusion that the field is safe to play on." (Page 6)
4. Field safe to play on. Detected compounds at concentrations below background and comparable standards for contact. Risk through direct contact de minimus (Powerpoint Presentation March 4, 2021 MVC Public Hearing.)



As discussed during our public hearing on March 4, 2021, native topsoil was found to have significantly higher concentrations of heavy metals, including lead, arsenic, cadmium, and 'forever chemicals' including PFAS and PFOS contaminants than found in any of the synthetic turf products proposed for this project.

Further, the use of just one synthetic turf field reduces the nitrogen load on the High School campus by 264 lbs. of nitrogen per year and reduces the irrigation demand on our aquifer by 1.18m gallons of water per year. The results of the testing show that, in this case, the use of synthetic turf is actually a cleaner option than modification of the existing native topsoil found on MVRHS campus.

We firmly believe development of athletic facilities in the manner proposed will have a more favorable impact on the environment in comparison to available alternatives.

(c) The proposed development will favorably affect other persons and property. Because of circumstances particular to the proposed location of the athletic field improvements the effect is likely to be greater than is ordinarily associated with the development of the types proposed;

The proposed development will favorably affect both person and property within and adjacent to the MVRHS campus. As eloquently stated by Mackenzie Condon, Don Herman, Matt Malowski, Ryan Kent, Zach Smith and many others, the benefits of improved athletic facilities will be far reaching, and have a significant impact on our youth for generations to come.

The residents of Deer Run & Schoolhouse Village, our closest residential abutters, have spoken loud and clear of their desire to limit growth and activity along our shared property lines. By consolidating our most active use in the location of the current game field, near the YMCA, ice rink, skate park and community services we will not only be a better neighbor to Deer Run & Schoolhouse Village, but we will also provide a better connection to compatible adjacent land uses which also serve our island youth and adult community.

As suggested by the MVC staff, MVRHS has agreed to install improved crosswalk and traffic markings in Edgartown Vineyard Haven Road with a Rectangular Rapid Flashing Beacon (RRFB). These improvements will significantly improve safety for pedestrians crossing between the YMCA, Ice Rink and the High School Campus. These improvements were initially outlined in the Howard Stein Hudson memo/report entitled ***Oak Bluffs High School Pedestrian Crossing Safety Improvements*** prepared for the MVC and dated August 6, 2019.

(d) The proposed development will favorably affect the supply of needed low and moderate income housing for island residents;

This project will have no adverse impact to the supply of needed low and moderate income housing for island residents. Further, because this project is privately funded it will not take important tax dollars away from the efforts to build and maintain affordable housing on Martha's Vineyard.



(e) The proposed development will favorably affect the provision of municipal services and the burden on taxpayers in making provision there for;

This project will be privately funded. We have requested that the MVC place a condition requiring that this project be privately funded in the DRI approval. Given that the initial construction and subsequent replacement costs for the synthetic turf surface will be privately funded there will be no adverse impact or burden to the taxpayer. Conversely, the use of private funds for this project will literally save millions of taxpayer dollars that would otherwise be needed to improve our failing athletic facilities and make needed improvements to ADA accessibility throughout our campus.

Further, as this project does not propose to increase the use of facilities on our campus there will be no adverse impact to municipal services.

(f) The proposed development will use efficiently existing public facilities and those which are to be developed within the succeeding five years;

The MVRHS campus is one of our most valued and highly used existing public facilities. The proposed improvements will make the most efficient use of our campus, maximizing the use of our valuable land while improving conditions to our closest residential abutters. The proposed improvements to parking, circulation and ADA accessibility will improve the safety of our campus and bring our athletic and campus facilities into compliance with existing building codes.

(g) The proposed development will aid with the ability of the Town of Oak Bluffs to achieve the objectives set forth in the municipal general plan; and

The proposed athletic field improvements will aid the Town of Oak Bluffs in their ability to achieve the Goals and Objectives set out in the 2019 Oak Bluffs Comprehensive Master plan and the 2015 Oak Bluffs Open Space and Recreation Plan, as noted below.

1. **2019 Oak Bluffs Comprehensive Master Plan.** The proposed improvements anticipated as part of this DRI application specifically help the Town of Oak Bluffs support the policies outlined in Section 4.4 (page 40).

A. Policies (4.4 Maintaining & Improving Open Space Areas)

1. **(Policy #1) Continue to prioritize upkeep of existing parks over expansion of parks or addition of new open space areas.**

This plan provides for upkeep of existing parks/recreation/athletic facilities and does not require the addition or acquisition of new open space areas.

2. **(Policy #3) Strive to improve recreation facilities and parkland as identified in the 2015 Open Space and Recreation Plan.**



The MVRHS site was identified in the 2015 Oak Bluffs Open Space & Recreation Plan with the comments that “The report also states that the Regional High School sees demand for additional soccer/lacrosse type fields.” (Page 17)

2. 2015 Oak Bluffs Open Space & Recreation Plan.

1. **According to the Park Commission’s Inventory/Conditions/Needs Analysis**, “The report also states that the Regional High School sees demand for additional soccer/lacrosse type fields.”
2. **Section 8 – Goals & Objectives - Goal B:** Improve Water Quality/Shellfish Habitat in Coastal Ponds. Objective A: Reduce nitrogen Levels in coastal ponds.
3. **Section 8 – Goals & Objectives – Goal C:** Improve recreation facilities and park lands. Objective A: Improve recreational facilities and services; Objective B: Improve park & conservation land, and; Objective C: Increase public recreation space access.

The proposed DRI application supports all of the above goals and objections. Specifically, the proposed scope of work allows for improved fields for soccer and lacrosse, reduces the nitrogen applications in the Lagoon Pond and Sengekontacket watersheds by 264 pounds annually, and provides pedestrian and ADA improvements which will increase access to all recreation facilities at MVRHS for those with disabilities.

(h) The proposed development will enhance land development objectives and policies developed by regional or state agencies.

The proposed development will not contravene land development objectives and policies developed by regional or state agencies. Conversely, the proposed improvements support the MVC’s objectives as outlined in the “*Island Plan*” dated December 10, 2009. Specifically, the proposed DRI application supports the following objectives of the MVC’s 2009 Island Plan:

5. **Challenge #7: Wastewater is polluting coastal ponds.** The use of one synthetic turf field eliminates 264 pounds of nitrogen in the Lagoon Pond and Sengekontacket watersheds and reduces our present irrigation demand by 1,118,000 gallons of water per year. This will have an immediate and direct benefit to both the Lagoon Pond and Sengekontacket watersheds.

The proposed improvements enhance pedestrian circulation, provide locations for bicycle arrival, and upgrade all facilities to be compliant with local codes, all of which are important components in the MVC’s Island Plan.

As mentioned previously, MVRHS has also agreed to install improved crosswalk and traffic markings in Edgartown Vineyard Haven Road with a Rectangular Rapid Flashing Beacon (RRFB). These improvements will significantly improve safety for pedestrians crossing between the YMCA, Ice Rink and the High School Campus. These improvements were initially



outlined in the Howard Stein Hudson memo/report entitled **Oak Bluffs High School Pedestrian Crossing Safety Improvements** prepared for the MVC and dated August 6, 2019.

For all the above reasons, the MVRHS project team would offer that the actual benefits of the proposed development far exceed the probable detriments, as evaluated in light of the considerations set forth in section 14(a) of the Act. Thank you for your time and consideration. Please let me know if you have any questions or require any additional information to complete your review.

Sincerely,
Huntress Associates, Inc.

Christian C. Huntress
President

Cc: Matthew D'Andrea – MVPS Superintendent
Richard Smith – MVPS Asst. Superintendent
Kimberly Kirk – Chair, MVRHS School Committee
Joseph Sullivan – Daedalus Projects, Inc.