

Good morning Mayor Gaskins and members of Council. I am Carter Flemming, and I am speaking on behalf of the Board of the Alexandria Federation of Civic Associations, also known as AFCA, so I request 5 minutes.

The AFCA Board would like to express our concern for, and opposition to, the text amendment to remove the current 80-foot height limit for light poles in congregate recreational facilities.

While AFCA appreciates Land Use Division Chief Tony LaColla's recent presentation about this bundle of text amendments at our April 30th AFCA meeting, we do not agree with the city's designation of this change as a 'minor text amendment.' Staff states that such lighting projects will still require an SUP, and therefore, staff will still have the ability to decide what is an appropriate height for future lighting projects coming forward. But we know that lighting companies will no longer have any incentive to find a plan that will work within a height limit in the city code, as there will be none.

The elimination of the height limit will have impacts across the city and, as such, AFCA believes this should have been, and still should be, the subject of robust community education outreach and public discussion. At our AFCA meeting, none of the civic association members had heard about this text amendment prior to Mr. LaColla's presentation. To bury this amendment in a bundle of other text amendments, does not demonstrate transparency to residents across the city, who will one day wonder why 100+ foot tall light poles are looming over their homes.

Staff's proposal, as is often the case, is focused on making it easier for applicants to propose light poles of unlimited height, rather than setting a standard that is reasonable for residents who live next to a school or recreational facility. The 80-foot height limit for light poles in the R-20 zone is already double the height allowed for other non-residential structures.

This amendment will allow Musco, who is the lighting company used by all recent lighting projects in the city, to present drawings and data that would require poles of 100 feet or more in every location. Staff, Council, and applicants do not have the expertise to challenge such technical conclusions and thus, Musco's recommendations will become the new city standards for lighting with little ability for residents to oppose whatever height is proposed, as there will be no limit.

My own neighborhood is quite familiar with Musco due to their lighting plans at Parker Gray Stadium. We have 80 and 90-foot tall poles behind our homes. Musco's plans showed that all glare miraculously stopped at the property line. This is not the case for at least one home on Bishop Lane that has been subject to extreme glare since the day the lights were put up. ACPS, who owns and operates the lights, states that this glare is perfectly acceptable and requires no adjustment. Based upon this experience, Council and staff should question whether Musco's diagrams and specifications can actually be relied upon by the city or its residents.

Moreover, on Page 158 of the application for the lights at Episcopal High School, which you will hear as the next docket item, Musco states that, "In some cases city ordinances or other factors require the use of shorter poles, a challenge that experienced manufacturers can typically resolve with customizations like additional poles or creative aiming strategies to achieve your lighting goals on and off the field." But somehow, we never hear about those creative aiming strategies, and the solution is always to go higher and higher. That is the easy way out. The adoption of this text amendment will simply remove any incentive for applicants or the city to challenge Musco to find those creative solutions to reduce the impact of towering banks of lights dominating the field of vision in residential areas across the city.

AFCA therefore asks Council to reject the unlimited height in this text amendment and retain the current 80-foot limit. Applicants would still be able to request a variance to this limit when necessary, as Episcopal

High School could have done. But applicants should not be able to take the path of least resistance and construct 100+ foot poles by right in every location if you approve this text amendment.

Thank you.

Carter Flemming
Chair, Alexandria Federation of Civic Associations