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July 8, 2018

Ms. Kathleen Matason, Chair  
Centre Region Parks & Recreation Authority (CRPRA) Board  
kdm1@psu.edu

Ms. Pamela Salokangas, Director  
Centre Region Parks & Recreation (CRPR)  
psalokangas@crcog.net

2643 Gateway Drive, Suite #1  
State College, PA 16801

Re: Whitehall Road Regional Parklands

Dear Ms. Matason and Ms. Salokangas:

The proposed regional park design at Whitehall Road has a long way to go before it meets the agreed-upon needs of our local population. Ask people in our region, or anywhere, what a "park" is, and they imagine something very different from this plan. CRPR's own surveys, from at least 2008 on, show ten times the desire for open space (trails, trees and flowers, picnic areas, sledding areas) as there is for structured sports. This is consistent with surveys from around the nation.

Yet the proposed Phase One of Whitehall Road Regional Park devotes a great deal of area, and by far the greatest tax dollars, for organized sports and its parking, rather than for what the

community says it needs. A great local park, on the other hand, might more closely resemble Penn State Arboretum or Pittsburgh's Schenley Park.

### **The Heart of Nittany Valley**

The site of the proposed Whitehall Road Regional Park is one of the most stunning natural areas in Central Pennsylvania. It offers magnificent vistas of Mount Nittany, Tussey Ridge and thousands of acres of open fields and meadows. It defines the essence of the term "viewshed." I strongly encourage any stakeholder who has not walked this site to do so, while all its potential can still be imagined.

Natural beauty is precious. It is why people love to live here. Particularly since the Penn State/Toll Brothers chapter, policymakers must consider not only built fields and facilities, but also preservation of resources, undeveloped views and open space, and Pennsylvania's wildlife in determining the final mix of amenities for our region. Accordingly, Nittany Valley Environmental Coalition encourages the Centre Region Parks and Recreation Authority Board to take a broad view of what constitutes "Parklands."

The current plan places far too much emphasis on team sports. This is not the place to emphasize those.

### **1. NVEC SUPPORT FOR FERGUSON TOWNSHIP LETTER**

The Nittany Valley Environmental Coalition strongly supports the letter of March 21, 2018 to the CRPRA Board, written by Ferguson Township Manager David Pribulka on behalf of the Ferguson Township Board of Supervisors. The Ferguson Township letter asks that the next planning and design phases adhere to the already agreed-upon principles stated in the Whitehall Road Regional Parklands Master Site Plan ("Whitehall Parklands") document created in August 2010 for the Centre Region Council of Governments. The document was the result of a comprehensive stakeholder-supported master plan process.

Ferguson's letter emphasizes the following points, presented here with expanded NVEC comments:

**Encourage permeable paving for parking and roads.** Encourage paved rather than gravel surfaces.

*Additionally:*

1. Design number of parking spaces not to perceived desires, but to code minimums.
2. Shade paved areas—both roads and parking—with trees to reduce heat islands. We understand that shading was originally planned, but later removed. This is contrary to all good planning practice in the last 20 years.

3. Refer to LEED standards for site and other facility planning. Although certification is not required, these offer realistic and proven design guidelines.

**Do not "improve" undeveloped portions of park.** Since there is no timetable for future phases: Request no grading; preserve natural habitat. Consider succession planting and reforestation.

*Additionally:*

1. Do not grade either Phase One areas labeled "Future," or Phase Two areas. Do not disturb this local birding hotspot.
2. As this is recent farmland, with heavy spraying, wildlife and beneficial insects have been impaired. Management plans must include cessation of herbicides and pesticides.
3. Consider the Wildlife Management Institute's Young Forest Guide principles, allowing areas for brush and young trees to grow up. These areas are "powerhouse" habitats for grouse, whip-poor-wills, reptiles, including turtles, and migrating birds.

**Update the Parklands Master Plan for subsequent phases** as Phase One is developed.

*Additionally:*

1. Make this an inclusive and transparent process, with broad community input.

**Green infrastructure and low impact parkland** for this and subsequent phases. Consistent with 2010 planning document, through the Sustainable Sites Initiative.

**Mitigate light and noise pollution.** Consider screening and natural buffering with height to prevent spillover light to adjacent properties.

*Additionally:*

1. NVEC respectfully requests that there be no site lighting. Besides the initial and yearly expense, night lighting affects not only adjacent properties, but will be visible for miles. It disrupts views of the night sky, bird migration and human health.
2. Consider stargazing as a popular, free outdoor activity that is difficult in town. Ideally, consider a sky observatory to complement PSU Davies Lab.
3. If there is lighting, it should conform to International Dark Sky Association (IDSA) standards, with zero off-site light spillage. Security lighting, if any, should be by motion-detector only.
4. Noise: NVEC respectfully requests no amplification/announcement systems. Pine Grove Mills already hears both Kocher Stables and Beaver Stadium loudspeakers. Loudspeakers here would be highly disturbing to adjacent and distant residential areas.
5. For noise control, establish hours of operation, and standards for activities and decibel levels in accordance with local ordinances, police, and community wishes.

## 2. RECAP OF WHITEHALL PARKLANDS PRINCIPLES

NVEC respectfully offers reminders of these principles from Whitehall Parklands:

**Plan first for the views and natural areas, then for the ballfields.** Chapter One of Whitehall Parklands: The site is "*exceptional in its scenic position with outstanding valley views*" and has "*spectacular...scenic values.*" Any coach will tell athletes: "Keep your eye on the ball." Views like these are vital for visitors, far less so for athletes.

**Less is More.** While recognizing a need for active playing fields, give top priority to lifetime activities. Or to simple relaxation. Consider also that sometimes the best thing is "nothing". One of America's most iconic park features, Central Park's Sheep Meadow, has no structures or structured activity. Reserve Whitehall Parkland's best view areas for non-sports use. From Whitehall Parklands: "*...diversity of complementary activities is important to creation of a great park.*"

**Xeriscaping.** 1. Plant native grass, shrub and tree species that, once established, require no watering, herbicides or pesticides. This provides tremendous yearly savings in maintenance. As a bonus, these will allow pollinator, beneficial insect, and bird populations to rebound. 2. Carry out sports turf design, and a management program, that reflects this.

**Invasive-species control.** Invasive plants are a growing problem in Ferguson Township and statewide. Invasives crowd out native plants, starving birds and wildlife; this cost must be included in operations budgeting.

## 3. ADDITIONAL THOUGHTS FROM NVEC

Eight years have elapsed since the original Whitehall Parklands plan. Much has changed since then, and current planning must reflect this.

**Maintain safe water supplies.** Whitehall Parklands is above and within the recharge area of the Harter and Thomas well fields providing drinking water to 75,000 State College area residents, above fragile karst limestone geology prone to sinkholes and fractures.

1. Construction and operation must not risk the safety of nearby State College Borough Water Authority wells and Slab Cabin Run. Accordingly, re-grade as little as possible of either Phase One or Phase Two. Do not re-grade now for future facilities.
2. Plan now for who is responsible if wells or stream are damaged.
3. Consider having the State College Borough Water Authority board certify the project as non-risk, absolving the Parks Authority and COG of liability for damages.

## **Provide the full range of amenities at every phase, including Phase One**

At every phase, the Parklands should contain the full blend of active, passive and natural areas, in similar proportions to those at completion of all phases. Phase One must, at a minimum, include the community gardens designated as "future" in the site plan.

Providing this full range will be more economical than a plan that prioritizes sports fields. It will help meet the three General Forum goals: small enough to cost \$4.8 million or less; within the (Whitehall Parklands) design area and with a broad enough range of features to be accepted unanimously by municipal legislators as a "regional" park.

**Are sports fields in fact necessary?** A casual drive around our region shows dozens of empty municipal and school fields everywhere, at all hours. A simple scheduling fix could eliminate or greatly reduce the need for expensive new fields.

1. Confirm current regional capacity and needs.
2. If the desire is for club tournaments, then recognize that concentrating the fields in one location may be ideal, but it is not a need.

**Re-Consider Artificial Turf.** The manufacture of artificial turf is highly energy-intensive and has severe impacts on water supplies. Surface runoff of rubber and plastic microparticles will discharge directly into our water supply.

1. Consider installing natural turf only, incorporating a "resting" field to allow recovery between seasons/years of use.
2. If artificial turf is used, apply current best practices for sourcing the materials and managing runoff. This discipline is evolving rapidly.

**Advanced Engineering for All Aspects.** Sophisticated engineering can be applied to all features of the Parklands, not only sports fields.

1. Consider hydroengineering to provide water features, including water for birds and wildlife, and as viewer focal points.
2. Consider engineered gravel for roadways.
3. Incorporate outdoor learning and STEM opportunities for local students.

**Consider Topography.** The proposed Parklands occupy a "hogback": a high tableland with stunning 360-degree views. No plans or studies, even Whitehall Parklands, have included slope analysis.

1. The best views must be reserved for the amenities that benefit from views.
2. The rise tilts down toward Whitehall road, therefore fields may be highly visible. Consider this in final layout of fields vs. natural areas.

3. Minimize re-grading, cut and fill, and retaining walls. Consider a peer review of current site plan document. There are large potential cost savings even in Phase One.

**Fill in the Skipped Steps.** Whitehall Parklands was planned in 2010 by an interdisciplinary team of land planners and landscape architects, with input from a wide range of stakeholders. Fast forward to 2018. Construction documents are being drawn for a piece of that plan by a very capable firm, but one whose core business is infrastructure engineering. In my experience, when that much time has elapsed, there is a re-visit of basic programming assumptions and design response.

1. Considering what our community now needs and is requesting, pause and carry out program confirmation.
2. Before proceeding with construction drawings, hire a landscape architect firm to create schematic and preliminary landscape architecture plans that take into account views, slopes, sun; trees and other vegetation, and surface and groundwater.
3. Carry out programming and design in a public process.

**Maintain cost effectiveness.** Maintain focus on both costs of construction and of subsequent operations. Reduce cost of both, by focusing the stated needs of the Centre Region population.

The Nittany Valley Environmental Coalition thanks you, your staff and all who have worked on this to date, and looks forward to helping to realize the fullest potential of this stunning property as true parklands for the entire community.

Sincerely,  
/s/ Randy Hudson

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