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March 29, 2000

Ms. Jerrily R. Kress
Board of Zoning Adjustment
441 4th Street, N.W., Suite 210
Washington, DC 20001

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OFFICE OF ZONING
DISTRICT OF COLUMBIA

Re: Application of the Morris & Gwendolyn Cafritz Foundation/
The Field School
Opposition to Application No. 16559

Dear Ms. Kress:

This is in follow-up to the letter submitted on behalf of Sylvia Shugrue dated March 8, 2000 and is in response to the Statement of the Applicant ("Statement") filed by The Field School (the "School"). In opposition to the application filed, Mrs. Shugrue responds as follows:

(1) The Statement states that The Field School "was founded on the belief that learning occurs best in an informal, personal and non-institutional environment." (p.2,ll.3-4) The school's plans call for an institution with multiple buildings for classrooms, an administration building, a large asphalt parking lot, tennis courts and playing fields in a self-contained area of approximately 10.5 acres in a residential community with no access to public transportation.

As an institution, the Field School will inevitably expand. Private schools throughout the Washington metropolitan area are building new facilities. As set forth in our letter of March 8, 2000, the Lab School and St. Patrick's Episcopal School now almost meet where once there was residential housing. During a meeting with Mrs. Shugrue at which the undersigned was present, a representative of the School's architect asked Mrs. Shugrue whether she would be interested in selling her home. Subsequently, Mrs. Shugrue was advised by Mr. Jeff Dwyer that the School had expressed an

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interest in buying both Mrs. Shugrue's house as well as the residential property next door to her.

(2) The Statement states that "[r]esidential properties facing W Street and Foxboro Place abut the south property line." (p.3) The Statement fails to mention that Mrs. Shugrue's house, located at 2207 Foxhall Road, abuts the south property line and is directly impacted by the proposed relocation of the School.

(3) The Field School acknowledges that one of the requirements for permitting its relocation to the Cafritz property is: "the private school must not be objectionable to adjoining and nearby property because of noise, traffic, number of students, or otherwise objectionable conditions (11 DCMR 206.2)." (p.6) As set forth in our letter of March 8, 2000 and herein below, the relocation of the School to the subject property creates conditions which are objectionable to Mrs. Shugrue in terms of noise, traffic, pollution, water management, lights and other conditions. Moreover, residents of W Street, Foxboro Road, Foxhall Cresent and others scattered in the neighborhood have voiced strong objections to the presence of The Field School at the Cafritz site.

(4) The Statement states that "[n]oise emanating from School would not adversely impact neighboring property due to the site's large area and the significant landscaping and tree buffer that will remain (and be substantially increased)." (p.7) The Applicant fails to account for the noise which will be created by the increased traffic directed to the south entrance of the site located close to Mrs. Shugrue's home. In fact, the Applicant has amended its plan to prohibit all cars from making left-hand turns into the property between 7:30a.m. and 9:00a.m. The Applicant's Traffic-Impact analysis acknowledges that "[d]ue to the right turn in/right turn out only access requirement, 100% of the school-related passenger vehicular traffic would approach the school from the south." (p.12) This will mean that 100% of all traffic arriving at the school will be routed past Mrs. Shugrue's home close to the proposed south entrance. This will include construction trucks and heavy equipment during the proposed 12-14 month construction period.

(5) As additional measures to control traffic, the School proposes to hire a traffic control officer to direct and manage traffic during the morning rush hour. (p.10). Such a proposal creates a safety issue for any traffic control officer. The Applicant's Traffic Impact analysis states that "[t]he sight distances along Foxhall in the vicinity of the school relocation site are not favorable." (p.9) "The School [also] will create a shuttle bus program that will pick up students and provide transportation from ... locations along major commuting arteries into the District such as the intersections of MacArthur and Loughboro and Massachusetts-Nebraska Avenues." (p.10) Shuttle pick-up at these two locations is simply not realistic. There are no safe pick-up places in these areas because of heavy traffic. Permission would have to be obtained from the nearby institutions to establish safe pick-up zones.

(6) The Applicant states that its representatives have met with staff of the National Park Service and the Building and Land Regulation Administration to discuss the adequacy of the proposed stormwater management plan and the School's civil engineer concludes that "the proposed use on the Property will not have an adverse impact on the surrounding community or the adjacent property owners." (pp.12-13) The Applicant's emphasis is the impact upon the Glover Archbold Park. While a stormwater management plan was mentioned to her, the School's civil engineer has not met with Mrs. Shugrue whose property currently is subject to water runoff from the Cafritz estate. The School's plans call for a larger impervious asphalt parking lot rather than a porous gravel/grass parking area more in conformance with the landscape.

(7) The School's proposed campus design "also includes a public sidewalk that has been placed on the School property in order to provide the safest opportunity for all members of the community to walk south along Foxhall Road." (p.14) The construction of a sidewalk along Foxhall would afford no safety to a pedestrian. The School's proposed sidewalk does not extend beyond the property line to W Street. The Applicant's own Traffic Impact Analysis observes that "[v]ehicular speeds.... exceeded the posted speed limit of 25 mph in the vicinity of the relocation site." (p.9) Mrs. Shugrue has resided on Foxhall Road for over 40 years. During that time, she has witnessed numerous accidents, a number of which have been

fatal. These have included instances where cars have crashed into the fence alongside the Cafritz property as well as the tree in her front yard. In recent years, a propane truck driving south on Foxhall Road lost control, crashed into the Cafritz property fence, spun around, caught fire and burned resulting in the downing of a high tension wire. But for the wind blowing towards the Cafritz property, Mrs. Shugrue's house would have caught fire. During her residency, Mrs. Shugrue has been visited not infrequently in the evening by drivers seeking to call for emergency assistance.

(8) The Applicant states that "the School's parking lot has been designed so that it is approximately 80 feet from the boundary of the property located at 2207 Foxhall Road, N.W." (p.14) However, the plans accompanying the Statement indicate that the entrance will be anywhere from 50 feet to 80 feet from Mrs. Shugrue's property. Moreover, the School's proposed traffic plan is to route cars entering the School site such that they will pass through an enormous asphalt parking lot close to Mrs. Shugrue's property and then proceed north toward the school buildings to drop off students in the morning and pick them up in the afternoon.

(9) The School states that "[a]ll outdoor sporting events on campus will only occur during the day since neither the athletic field or the tennis court will have lights." (p.8) The School's Operations Plan, however, states that "[t]he School will shut the lights to the southern most parking lot at 9:00 p.m. and not turn on the lights at this parking lot on Saturday and Sunday except for special events." There appears to be no reason why lights should be left on until 9:00 p.m. The greatest impact of the these lights will be on Mrs. Shugrue whose property is closest to the parking lot. Mrs. Shugrue's second floor bedroom faces the Cafritz property and out towards the proposed parking lot.

The Applicant's proposed plan creates a myriad of problems. The Applicant's recent amendments and modifications simply move those problems around. The impact is not equally distributed throughout the immediate neighborhoods. Rather, the Applicant's plans and modifications move those problems to, and focus the impact upon, Mrs. Shugrue's adjoining property.

For these reasons, Mrs. Sylvia Shugrue opposes The Field School's application to locate to the Cafritz site.

Respectfully submitted,

Alan R. Swendiman

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