MAR 2 9 2000

THE FIELD SCHOOL
BZA APPLICATION NO. 16559

STATEMENT OF
JEFFREY W. BOLOTIN
IN OPPOSITION

BZA
Case No. 16559
Exhibit No. 373

Board of Zoning Adjustment
District of Columbia
CASE NO.16559
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STATEMENT OF JEFFREY W. BOLOTIN

Good afternoon, my name is Jeffrey Bolotin. My family and I have lived in Foxhall Crescents Southgate since 1985. I was a member of the citizens group that met with George Washington/Mt. Vernon in connection with their campus plan and was also a part of the mediation that took place thereafter resulting in a resolution satisfactory to both the school and the neighborhood. I am here individually and on behalf of the Foxhall Crescents Southgate Homeowner's Association.

It is fair to say that we are looking for the BZA to protect our neighborhood and the safety of our residents. We believe that the proposed relocation of the Field School to be an unwarranted intrusion upon our neighborhood. We believe that the traffic generated by the school will be detrimental to our neighborhood and to the community at large. We believe that the relocation of the Field School raises a serious issue of safety and should be rejected.

If we were before a court of law we would ask the court to take judicial notice of the danger of Foxhall Road. Just two weeks ago on Friday afternoon, March 10, 2000, there was an accident immediately in front of the Cafritz Property which closed Foxhall Road while the two cars involved in the accident were removed. Again on Monday, March 13, 2000, another accident occurred during the morning rush hour that severely delayed traffic on Foxhall Road. On January 1, 2000 there was a traffic fatality on Foxhall Road. With the proposed school only having ingress and egress on Foxhall Road these disruptions, which are not isolated events, will have a profound effect on the school. The school has no solution for these occurrences or for any emergency that effects Foxhall Road. The school bargained away its access to 44th Street by reaching an agreement with its Wesley Heights neighbors that promised no citizen opposition in return for the school foregoing its access to 44th Street.

When we were first apprized of the plans of the Field School almost one year ago our immediate reaction was that a school was not an appropriate use for the property. As the school's plans have been finalized and details provided our opinion has only been strengthened. The property size and location is simply not appropriate for the proposed use of a school.

The Field School proposes that its only entrance and exit be on Foxhall Road, that teenagers driving to the school be required to bring with them at least two additional students and that the preferred traffic pattern to the school utilize an already crowded thoroughfare, MacArthur Blvd., for which they provide no traffic information. This thoroughfare is already flooded with traffic to two other schools (St. Patrick's and George Washington/Mt.Vernon) and is in close proximity to Our Lady of Victory School and The Lab School.

I do not think it takes an expert to tell you how unsafe and dangerous Foxhall Road is at the proposed school location: one narrow lane in each direction, with the Spanish and Belgian Ambassadors' residences with a combined 80 car parking area directly across the street. Only one block away on W Street is the George Washington/Mt. Vernon Campus that will more than triple in size. The experts for each party as well as the District's Department of Public Works note the following:

Page 9 of the Gorove/Slade Traffic Report for Field School Application:

"1. THE SIGHT DISTANCES ALONG FOXHALL ROAD IN THE VICINITY OF THE SCHOOL RELOCATION SITE ARE NOT FAVORABLE DUE TO THE EXISTING VERTICAL AND HORIZONTAL CURVATURES OF THE ROADWAY.

2. VEHICULAR SPEEDS ALONG THE FOXHALL ROAD CORRIDOR EXCEED THE POSTED SPEED LIMIT OF 25 MPH IN THE VICINITY OF THE RELOCATION SITE.

3. FOXHALL ROAD SERVES A SIGNIFICANT AMOUNT OF NORTH-SOUTH COMMUTER TRAFFIC BY PROVIDING ACCESS FROM NEBRASKA AVENUE AND LOUGHBORO ROAD TO GEORGETOWN AND THE WHITEHURST FREEWAY. THIS COMMUTER TRAFFIC CONTRIBUTES TO THE SPEEDING AND CONGESTION EXPERIENCED BY MOTORISTS IN THE FOXHALL ROAD CORRIDOR."

The traffic report of MCV Associates submitted on behalf of Neighbors Against Foxhall Gridlock states on page 3 and on page 8:

> **"THE PROPOSED SCHOOL SITE IS LOCATED OFF FOXHALL ROAD JUST NORTH OF W STREET. FOXHALL ROAD IS A TWO LANE NORTH-SOUTH ROADWAY IN THE VICINITY OF THE SITE, WITH VERTICAL HORIZONTAL CURVES THAT RESULT IN INADEQUATE SIGHT DISTANCE AT SEVERAL LOCATIONS ON IT.**
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> **THE INTERSECTION OF MACARTHUR BLVD AND WHITEHAVEN PARKWAY IN NOT SIGNALIZED. WHITEHAVEN PARKWAY WILL BECOME THE PRIMARY ACCESS ROADWAY TO THE GEORGE WASHINGTON/MT. VERNON CAMPUS AND IS PRESENTLY THE MAIN ACCESS FOR ST. PATRICK'S EPISCOPAL DAY SCHOOL.**
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> **THIS ANALYSIS CONCLUDES, THAT FROM A TRAFFIC PERSPECTIVE, THE ADDITION OF THE FIELD SCHOOL TO THE FOXHALL ROAD NEIGHBORHOOD MAKES A BAD SITUATION WORSE. THE TRAFFIC IMPACTS OF THE FIELD SCHOOL ARE VERY SEVERE RESULTING IN UNACCEPTABLE CONDITIONS AT ALL THREE INTERSECTION ANALYZED."**

The Department of Public Works notes on page 2 and on page 4 of its report:

> **"IT SHOULD BE NOTED THAT FOXHALL ROAD IS OPERATING AT OR OVER CAPACITY DURING THE A.M.. AND P.M. RUSH HOURS. WE NOTE THAT FOXHALL ROAD IS A MINOR ARTERIAL WITH A PAVED WIDTH OF 22 FEET AND AN AVERAGE DAILY TRAFFIC VOLUME OF 17,500 VEHICLES IN THE VICINITY OF THE SITE. ANY SUBSTANTIAL TRAFFIC INCREASE ALONG FOXHALL ROAD MAY EXACERBATE THE EXISTING TRAFFIC CONDITIONS.**
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> **FOXHALL ROAD, N.W. SUFFERS FROM TRAFFIC CONGESTION DURING THE MORNING RUSH HOUR PERIOD, WHICH COINCIDES WITH PEAK MORNING TRAFFIC AT THE PROPOSED FIELD SCHOOL. VEHICULAR TRAFFIC ENTERING THE FIELD SCHOOL WILL CAUSE ADDITIONAL CONGESTION ALONG FOXHALL ROAD, AND MAY INCREASE TRAFFIC ON ADJACENT RESIDENTIAL STREETS."**

We submit that the foregoing admissions from each traffic expert are enough right there for you to deny the requested application. In addition the Advisory Neighborhood Commission has voted unanimously to oppose the application after more than three public meetings at which full presentations were made by those for and against the school. Chair, Eleanor Roberts Lewis, stated "For every solution we find, it appears to hoist the problem onto someone else."

Despite this consensus of traffic concerns, the school's traffic consultant (Gorove/Slade) nevertheless states at page 19 of its report "The Field School will generate traffic levels which can be accommodated by the public street system with out adverse impacts". This statement in my opinion is not only without foundation but it is contradicted by the very report that it is a part of, and on its face is so biased that it casts doubt on the validity of the entire report which we urge you to reject.

Having found no adverse impact and adequate existing traffic capacity Gorove/Slade proceeds to formulate a traffic plan that has all of the traffic originating north of the proposed school (approximately 60%) coming to the intersection of MacArthur Blvd. & Whitehaven Parkway (which intersection is not signalized) and working its way across Whitehaven Parkway to Foxhall Road making a left hand turn at a to be installed traffic light and proceeding north to the proposed school site.

This plan is not viable as recognized by the Department of Public Works at page 3 of their report:

> **" THERE IS NO GUARANTEE THAT TRAFFIC COMING FROM THE NORTH WOULD ACCESS THE FIELD SCHOOL USING THE TRAFFIC PATTERN RECOMMENDED BY THE APPLICANT: MACARTHUR BOULEVARD TO WHITEHAVEN PARKWAY AND FOXHALL ROAD. AS REFLECTED IN THE TRAFFIC REPORT PREPARED ON BEHALF OF THE OPPONENTS, THE MOST DIRECT ROUTE IS FOXHALL ROAD AND A RIGHT TURN ON THE LOCAL RESIDENTIAL STREETS, NAMELY GARFIELD STREET AND DEXTER STREET AND THEN USE 49TH STREET TO REACH W STREET EASTBOUND TO FOXHALL ROAD. THEREFORE, THE POTENTIAL TRAFFIC IMPACT OF THIS PROPOSED TRAFFIC SCENARIO ON THE RESIDENTIAL NEIGHBORHOOD BY THE SCHOOL RELOCATION CANNOT BE DISCOUNTED."**

If we assume the school is correct and this preferred route is followed to the school, it would interfere with St. Patrick's, Lab School and the new George Washington/Mt. Vernon Campus relocated entrance on Whitehaven Parkway.

If the traffic generated by the Field School can be accommodated by the public street system as found by Gorove/Slade, what is the purpose for having traffic use this circuitous route which will adversely affect another major artery (MacArthur Blvd.) and conflict with at least two other schools.

We submit the only reason is that Foxhall Road cannot safely handle its existing traffic let alone this additional traffic.

Further the Gorove/Slade Reports does not accurately reflect the additional traffic on Foxhall Road caused by the Spanish Ambassador's complex and the tripling of the George Washington/ Mt. Vernon Campus only one block away on W Street. The student enrollment at the George

Washington/Mt. Vernon Campus will go from 250 students to 1,500 equivalent students, plus the additional faculty and support personnel needed to compliment this growth. The number of dormitory rooms at the campus will expand from 250 to 700.

The right hand turn only policy (excluding shuttle buses) during the A.M. rush hour, as the Department of Public Works notes on page 3, "may actually encourage more traffic to weave through the surrounding residential neighborhood to access the school." I submit that the George Washington/Mt. Vernon College Mediation, which had its main point limiting traffic on local streets and resulted in the relocation of George Washington/Mt. Vernon Campus entrance to Whitehaven from W Street, will be overturned by the proposed school relocation.

This is especially outrageous given that the Field School has the same law firm and traffic consultant as did George Washington/Mt. Vernon.

These same experts also represent St. Patrick's School as well. It can be expected that the traffic exiting the school during the A.M. rush hour will wind up on Garfield, Dexter, 49th and W Streets since all existing traffic must make a right hand turn. This is exactly what the George Washington/Mt. Vernon College Mediation sought to avoid. Remarkably the Gorove/Slade Report at page 13 shows no A.M. exiting traffic making a left on Garfield Street only right hand turns. This is simply an unsupported and a false conclusion.

The assumption that 38 student drivers will each carry 2.5 students despite the young driver limitations of the Safe Teenage Driving Amendment of 1999 as well as hope that 36% of students will take advantage of a two step public transportation program (metro and shuttle bus) that is not mandatory, because 36% of the current student body currently utilizes a one step public transportation (metro) defies logic. In public questioning before the ANC about the shuttle system it became clear that the supposed drop off points have not been defined and the number of buses have been under estimated as has the time of each shuttle trip.

All of these assumptions are made with single purpose of attempting to hide the true level of traffic coming to the school.

Once the application is granted, whether the assumptions are correct or incorrect, will not matter because the harm to the neighborhood would have already been done. The school will not be required to shut down because their assumptions cannot be met.

Further, no one has addressed the consequence of the school's construction especially given the fact that the George Washington/Mt. Vernon Campus expansion is only one block away and construction will be underway at the very same time.

I submit the P.M. rush hour will be effected by parents, students and faculty exiting the school with no prohibition on left hand turns as much as the A.M. rush hour.

The Department of Public Works states at page 3 that the "applicant has not fully examined the impact of after-school extra curricular activities on traffic patterns in the area." Obviously, having inexperienced teenage drivers exiting the school onto a busy street at rush hour or for that matter at any time where there is poor visibility is a dangerous situation.

The Department of Public Works has not accepted these assumptions and explicitly finds that traffic is going to wind up on Foxhall Road. The Department of Public Works has suggested certain improvements should the BZA approve the school's application. It should be noted that the Department of Public Works has nowhere in its report recommended approval of the application and it is submitted that a fair reading of its report leads to the opposite conclusion - that the application should be rejected. I believe these suggestions, a left hand stacking lane and a possible traffic light in front of the school, to be unworkable for the stacking lane will 1) have cars stopped on Foxhall Road , 2) the southern most entrance to the school will have to be moved so as not to interfere with the proposed left hand stacking lane thus working a further burden on the immediate neighbors, and 3) Foxhall Road will become gridlocked. The attorney for the school at the ANC meeting held on March 13, 2000 advised that without additional right of way from the City and without the Kreeger Museum relocating its southern wall that the stacking lane would not be workable. The Department of Public Works should be required to readdress their suggestions if the BZA were to consider granting the application which as stated previously should not be done.

There is simply no solution to the traffic that the relocation of this school will produce. For all of these reasons we urge you to protect our neighborhood and the safety of all residents and deny the application.

Thank you.