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August 10, 2000

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OFFICE OF ZONING
DISTRICT

Hand Delivery

Sheila Cross-Reid, Chairperson
District of Columbia Board of Zoning Adjustment
441 4th Street, N.W.
Suite 210
Washington, D.C. 20001

Re: The Field School
BZA Application No. 16559

Dear Chairperson Reid:

Pursuant to the Board's instruction at the Public Hearing held on July 25, 2000 in the above-referenced matter, enclosed please find the following:

(a) the Applicant's Concluding Remarks, including a discussion of further contacts with Mrs. Shugrue and her attorney;
(b) requested information concerning the testimony of James Long of Delon-Hampton and Associates; and
(c) the Applicant's Construction Management Plan which was filed on the date of the second hearing but apparently is missing from the record.

Sincerely,

Phil T. Feola

Phil T. Feola

Paul A. Tummonds, Jr.

Paul A. Tummonds

Enclosures

cc: Elizabeth Ely
Office of Planning

BZA
Case No. 16559
Exhibit No. 469

Board of Zoning Adjustment
District of Columbia
CASE NO.16559
EXHIBIT NO.469

Wilkes Artis
Chartered

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing letter and enclosures were hand delivered this 10th day of August, 2000, to the following:

Advisory Neighborhood Commission 3D
c/o Beverly Monroe, Administrator
3900 Legation Street, N.W.
Washington, D.C. 20015

Alan Swendiman, Esquire
Jackson & Campbell
1120 20th Street, N.W.
Suite 300 South
Washington, D.C. 20006

Richard Aguglia, Esquire
Hunton & Williams
1900 K Street, N.W.
Washington, D.C. 20006-1109

Mr. Jeffrey Bolotin
4604 Foxhall Crescent Court, N.W.
Washington, D.C. 20007

Paul A. Tummonds, Jr.

CONCLUDING REMARKS OF PHIL FEOLA
COUNSEL FOR THE APPLICANT
BZA APPLICATION NO. 16559

If you pare away all the rhetoric that the Board has heard over the many, many hours of this proceeding, what is left is a request to establish a small, private school – a School with a richly diverse student body and faculty and a School which has shown the remarkable ability, as the testimony from witnesses demonstrated, to direct kids' energy towards a positive pursuit. It is a School, as was testified by its founder, that in 28 years has sent 100% of its graduates to college.

The Field School has proved in 28 years that its mission has been so well accomplished that former graduates, on their own volition, came back to testify before this Board (from as far away as Pennsylvania) to urge your approval. It is a School where the former President of the District of Columbia Board of Education sent his child, and was so grateful to the School for its help with that child, that he demanded that he be allowed to participate in this proceeding.

The School has worked hard to address all of the community's concerns. It has received the support of the Palisades Citizens' Association (which represents 15,000 residents), the Wesley Heights Historical Society, the Foxhall Crescents Homeowners' Association and its immediate neighbors represented by the Wesley Heights Association for the Preservation of Residential Streets. The BZA has received over 250 letters in support of this application. It is a School whose supporters, over 35 in number, sat through hours of this hearing in order to testify before this Board. And it is a School that has worked hard to earn the support of the Office of Planning and the Department of Public Works.

This applicant should be viewed as a model as to how a BZA applicant should work with the community. It heard concerns and adjusted its plans accordingly. It did this, not merely to achieve BZA approval, but because it understands as an institution that it teaches values by its action; and its actions in this case demonstrate to its students how to be a good citizen and a good neighbor. It is most telling to note that in all the hours of testimony before the Board on this application, only seven residents (not including their lawyers and experts) testified in opposition to this application.

At the conclusion of the July 25, 2000 Public Hearing, Chairperson Reid asked the applicant to pursue further discussions with Mrs. Shugrue, the property owner immediately to the south of the proposed site of the school. Shortly after the hearing, the applicant's attorney had discussions with Mrs. Shugrue's attorney, Alan Swendiman, and followed up those discussions with a letter to Mr. Swendiman outlining the School's proposals to alleviate Mrs. Shugrue's concerns about the School's relocation to 2301 Foxhall Road (a copy of the letter is attached). The School's proposal addressed the issues of re-designing the landscape planting adjacent to her property, developing a drainage system to mitigate any water run-off onto Mrs. Shugrue's property, operation of the School's parking lot and permitting visitors to Mrs. Shugrue's house to utilize the School's parking lot. The applicant has been informed by Mr. Swendiman that Mrs. Shugrue can not agree to anything that is going to be workable for both the school and for her.

This School, and its potential existence on Foxhall Road, will not create an objectionable condition due to noise, number of students, traffic or other objectionable conditions. It is a good land use for the site. We urge you to approve this application – the District of Columbia deserves this School.

Phil T. Feola
202.457.7317
pfeola@wilkesartis.com

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Attorneys at Law

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August 2, 2000

Via Facsimile

Alan R. Swendiman, Esq.
Jackson & Campbell
1120 20th Street, N.W.
Suite 300 South
Washington, D.C. 20006

Re: The Field School
2301 Foxhall Road, N.W. ("Subject Property")

Dear Alan:

Pursuant to our discussion, on behalf of The Field School, we would like to find a way, within reason, to accommodate the concerns of your client, Mrs. Sylvia Shugrue, with regard to The Field School's relocation to 2301 Foxhall Road. In recognition of Mrs. Shugrue's unique location adjacent to the Subject Property, the following are some thoughts for Mrs. Shugrue's consideration. These are listed in no particular order, and with no particular degree of importance, but they are merely items for discussion between you and your client to see whether, or not, some, or all, of these items might be helpful to alleviate Mrs. Shugrue's concerns about The Field School's relocation to the Subject Property.

1. Landscape Planting

At the hearing, Mrs. Shugrue indicated that she had consulted with a landscaper who suggested a different form of planting in the area between her property line and the School's parking area. The School would be willing to work with Mrs. Shugrue (and her landscaper) to ensure that the species, size and screening for the 100 foot buffer area between her property and the parking area is done effectively.

2. Drainage

An issue was raised at the hearing about drainage from the Cafritz property onto Mrs. Shugrue's land. The School could work with Mrs. Shugrue to develop a drainage system that would mitigate the water runoff coming from the Cafritz property, including the amount that currently exists, onto Mrs. Shugrue's property.

3. Parking Lot

The School would be willing to discuss the lighting plan and the operation of those lights, i.e., shutting them off earlier than currently proposed, to accommodate this particular concern that Mrs. Shugrue expressed to the BZA.

4. Parking

As Mrs. Shugrue testified at the hearing, visitors to her house sometimes use her driveway turnaround space thereby blocking her ability to exit her property onto Foxhall Road. The School would be willing to allow her visitors to park on the School's property, thereby keeping her driveway turnaround area free for her own automobile movements.

As indicated above, the School would be willing to discuss any of these issues or any potential solutions to Mrs. Shugrue's concerns. Unfortunately, due to summer vacation, none of the above ideas have been "costed out" or have had the School's approval. However, the School would like to reach an accommodation with Mrs. Shugrue to make her more comfortable with the change in the use of the Cafritz property. Please discuss these issues with your client and let us know if there is something upon which we can craft an agreement between the parties. If you have any questions, please feel free to call.

Sincerely,

Phil T. Feola

Paul A. Tummonds

CC: Larry Buc
Elizabeth Ely

205401

JAMES R. LONG, P.E.

SELECTED PROJECTS INVOLVING TURN LANES

PROJECT NAME	JURISDICTION	YEAR BUILT
• Falls and River Roads Intersection Improvements	MSHA	1988
• Springfield Bypass Daventry Segment	VDOT	1988
• Reichs Ford Road Realignment	Frederick County	1989
• Maryland Route 7 @ Abingdon Road	MSHA	1991
• Maryland Route 48 Access Improvements	MSHA	1992
• Maryland Route 543 Extended	MSHA	1993
• Relocated East Ridgeville Road @ MD Route 27	MSHA	1996
• Auth Road METRO Access Improvements	MSHA	1998
• O'Donnell Street Viaduct Reconstruction	Baltimore City	1998
• Baltimore Beltway Ramp A @ MD Route 26	MSHA	1999

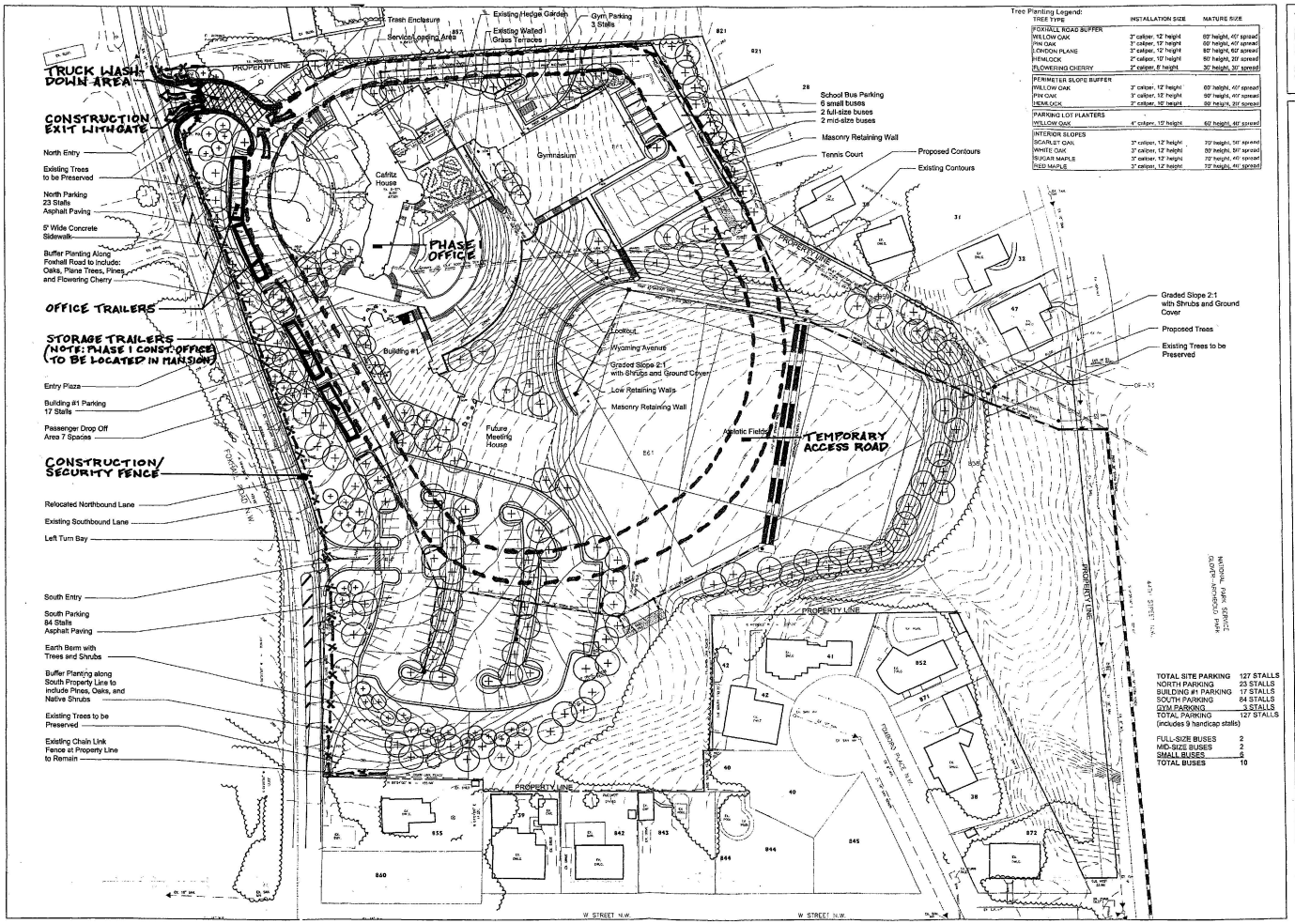
THE FIELD SCHOOL
CONSTRUCTION MANAGEMENT PLAN

The construction process will be carefully managed to minimize the impact on the surrounding residential properties. Hitt Contracting has been selected by the School to perform the construction, in part because of their considerable experience in building projects in sensitive residential neighborhoods.

The total construction period is estimated to take 12 to 14 months and is expected to start in the latter part of 2000. Construction hours will generally be from 7:30 AM to 5:00 PM Monday through Friday. Hitt Contracting and The Field School will have a continuously available neighborhood construction liaison person designated throughout the construction process to answer questions and provide information to the neighborhood. The name and telephone/pager number of the construction liaison person will be provided to neighbors and community organization representatives. If for some reason, special deliveries or specific construction has to happen outside the normal construction timeframe, the neighborhood liaison person will coordinate with neighborhood representatives well ahead of time to mitigate any potential adverse impact on the neighborhood.

Entrance to the site during construction will take place only at the existing north entrance off Foxhall Road, through a controlled gate. A flagman will be posted to help left turns into the site, but no left turns will be allowed during the AM rush hour peak. All construction vehicles exiting the site will turn right on Foxhall Road at all times, heading north to Loughboro Road and then west to Dalecarlia Parkway and River Road. The entire site will be fenced off with a security chain link fence. All truck and vehicle parking, material staging, storage, and contractor's trailers will be located on the site adjacent to the north entrance, along the site access road running parallel to Foxhall Road. The site access road will form a loop encircling the construction area and will remain in place only until after the completion of construction. The south loop of the access road has been aligned so that it is well away from the properties along the south property line.

Site excavation cut and fill work has been designed to minimize the exporting or importing of soil to the site in order to reduce the amount of heavy truck activity. The new buildings have been designed to fit the contours of the land as much as possible and where fill is necessary, the material will come from stockpiled on-site dirt taken from other areas of site excavation. Soil erosion control methods will conform to the D.C. Building Code standards and will include straw bales, silt fences and a wash-down area for all construction vehicles before exiting the site.



Tree Planting Legend:

TREE TYPE	INSTALLATION SIZE	MATURE SIZE
FOXHALL ROAD BUFFER		
WILLOW OAK	3" caliper, 12' height	60' height, 40' spread
PIN OAK	3" caliper, 12' height	60' height, 40' spread
LONDON PLANE	3" caliper, 12' height	80' height, 60' spread
HEMLOCK	2" caliper, 10' height	60' height, 20' spread
FLOWERING CHERRY	2" caliper, 8' height	30' height, 30' spread
PERIMETER SLOPE BUFFER		
WILLOW OAK	3" caliper, 12' height	60' height, 40' spread
PIN OAK	3" caliper, 12' height	60' height, 40' spread
HEMLOCK	2" caliper, 10' height	60' height, 20' spread
PARKING LOT PLANTERS		
WILLOW OAK	4" caliper, 12' height	60' height, 40' spread
INTERIOR SLOPES		
SCARLET OAK	3" caliper, 12' height	70' height, 50' spread
WHITE OAK	3" caliper, 12' height	80' height, 60' spread
SUGAR MAPLE	3" caliper, 12' height	70' height, 40' spread
RED MAPLE	3" caliper, 12' height	70' height, 40' spread

THE FIELD SCHOOL
2301 FOXHALL RD
WASHINGTON, DC

KRESS COX ASSOCIATES, P.C.
ARCHITECTURE PLANNING INTERIOR DESIGN
2009 M STREET, NW
WASHINGTON, DC 20007
202.965.7070
FAX 202.965.7144

McMULLAN ASSOCIATES
STRUCTURAL ENGINEER
8381 OLD COURTHOUSE ROAD
SUITE 300
VIENNA, VA 22182
703.556.0651
FAX 703.556.0378

ENGINEERING DESIGN GROUP, INC.
MECHANICAL ELECTRICAL PLUMBING
1625 K STREET, NW
TENTH FLOOR
WASHINGTON, D.C. 20006
202.862.9000
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R. C. FIELDS, JR. & ASSOCIATES
LAND SURVEYING SITE PLANNING SUBDIVISION DESIGN
716 JEFFERSON STREET
ALEXANDRIA, VA 22314
703.549.6422
FAX 703.549.6432

RHODESIDE & HARWELL, INC.
LANDSCAPE
320 KING STREET
SUITE 202
ALEXANDRIA, VA 22314

POLYSONICS CORP.
ACOUSTICAL & COMMUNICATIONS CONSULTING
5115 MacARTHUR BLVD., NW
WASHINGTON, D.C. 20016
202.244.7117
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CONSTRUCTION MANAGEMENT PLAN

scale: 1" = 40'
drawn by:
checked by:
project no.: 9908
date: 3 MAY 2000