ShawPittman LLP

A Limited Liability Partnership Including Professional Corporations

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D.C. OFFICE OF ZONING
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January 13, 2003

By Hand Delivery

Mr. Geoffrey Griffis
Chairperson
District of Columbia Board of Zoning Adjustment
441 4th Street, NW, Room 210
Washington, DC 20001

Re: Response to BZA Request for Additional Information Regarding The Field School's Satisfaction of the Conditions Included in BZA Order Nos. 16559 and 16559-B

Dear Mr. Griffis:

On December 30, 2002, The Field School (the "School") filed a motion for modification of the BZA's approval in BZA Order No. 16559-B to approve a one month extension of the School's alternative transportation management plan. In response to this motion, the BZA has requested that the School provide information regarding its satisfaction of the conditions of approval that were established in BZA Order No. 16559 and the subsequent modification order, BZA Order No. 16559-B. This document provides the requested information.

Background Information

BZA Order No. 16559 included 42 conditions that were divided into seven categories; Operations, Traffic Management, Parking Lot, Lighting, Construction Management, Storm Water Management, and Community Outreach. BZA Order No. 16559-B included 11 conditions that superceded the Traffic Management conditions of BZA Order No. 16559. In regards to the satisfaction of all of these conditions, the School notes the following:

BZA
Case No. 16559
Exhibit No. 512

Board of Zoning Adjustment
District of Columbia
CASE NO.16559
EXHIBIT NO.512

Approved Plans (BZA Order No. 16559 – Condition No. 1)

Condition No. 1 requires that the School buildings and facilities be constructed in accordance with the plans approved by the BZA. The school buildings and facilities have been, or are being[1], constructed in accordance with the plans approved by the BZA.

OPERATIONS (BZA Order No. 16559 – Condition Nos. 2-12)

All of these conditions have been satisfied. The total student enrollment on September 15, 2002 was 260. The student enrollment as of the date of this letter is 259. There are presently 62 faculty and staffmembers at the School. Inbound vehicular trips during the AM peak hour period of 7:30 – 8:30 ranged from the mid 60's to the mid 90's, as evidenced by traffic counts prepared by O.R. George & Associates, Inc. (copies attached as Exhibit A). These counts, it should be noted, include many trips by construction related vehicles, which will obviously terminate when the project is fully completed.

In regards to Condition No. 12[2], for safety reasons it is necessary for the School to delay the implementation of this Condition until all construction materials and related equipment are removed from the site. During the recent snow storms, members of the public have sought to use the School property for sledding, unfortunately the snow covers up some of the equipment that it is still being utilized on the site and presents a potentially dangerous situation. Therefore, in order to avoid injury to the public, the School sent a letter to its immediate neighbors and members of the Foxhall community on December 20, 2002, the letter was also published in the Northwest Current, informing them that the School will not be able to allow members of the public to utilize the School property **until** all construction related materials and equipment are removed from the property. A copy of the December 20, 2002 letter is attached as Exhibit B.

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[1] At the present time the athletic fields remain under construction. The meeting house and the academic addition buildings that were approved by BZA Order No. 16559 as a second phase of the project have not yet been built, but the School is presently in the planning/design stage.

[2] This Condition requires the School to allow local residents to use the athletic field and tennis court and to stroll the grounds.

TRAFFIC MANAGEMENT (BZA Order No. 16559-B – Condition Nos. 1-11)

All of these conditions have been satisfied, or are the sole responsibility of the District to satisfy. For example, Condition No. 2 of BZA Order No. 16559-B requires the installation of two flashing beacons south of the modified school entrance, the District has not installed these beacons at this time. Similarly, Condition No. 3 of BZA Order No. 16559-B requires the installation of school zone warning signs and signs notifying drivers of the school entrance traffic control signal on Foxhall Road. These signs have not been installed by the District, but work has begun by the District's contractor on the improvements to the Foxhal Road public right-of-way adjacent to the School and such installation should occur within a few months.

In regards to Condition Nos. 8 and 10, regarding the routes that the shuttle bus and teachers and staff will take to the School property, the School notes its submission to BZA and the affected ANC's on September 10, 2002. A copy of this submission is attached as Exhibit C.

PARKING LOT (BZA Order No. 16559 – Condition Nos. 25-29)

All of these conditions have been satisfied.

LIGHTING (BZA Order No. 16559 – Condition Nos. 30-33)

All of these conditions have been satisfied.

CONSTRUCTION MANAGEMENT (BZA Order No. 16559 – Condition Nos. 34-37)

All of these conditions have been, or are in the process of being, satisfied. The School notes that in its August 14, 2002 submission to the BZA, the School provided the BZA with evidence of its satisfaction of Condition No. 35, which required monthly meetings with neighbors and community representatives to discuss construction activities. These meetings began in May of 2001 and continued through May of 2002. As evidenced by the reminder letters and sign-in sheets previously submitted to the BZA, notice of the meetings were generally sent out 10-14 days prior to the meetings and attendance at these meetings averaged about 6-7 individuals from the community.

STORM WATER MANAGEMENT (BZA Order No. 16559 – Condition Nos. 38-40)

All of these conditions have been satisfied.

COMMUNITY OUTREACH (BZA Order No. 16559 – Condition Nos. 41-42)

Both of these conditions have been satisfied. On December 2, 2002, the School sent a letter to its neighbors inviting them to a meeting at the School on December 12, 2002 to discuss the School's operations at the Foxhall property. A copy of the text of this invitation is attached as Exhibit D. At the December 12, 2002, meeting, Anne Heuer (an ANC 3D Commissioner) proposed that the School hold more frequent meetings than required by Condition No. 42. The Chairman of the School's Board of Trustees agreed to have another meeting with the community approximately one month after the improvements on Foxhall Road are completed.

Conclusion

Based on the information outlined above, it is apparent that the School has acted in an appropriate and diligent manner in satisfying the conditions of approval established by the BZA in Order Nos. 16559 and 16559-B. Therefore, we believe that the School's request for a one month extension of the alternative transportation management plan approved in BZA Order No. 16559-B should be granted.

Respectfully submitted,

Phil T. Feola

Paul A. Tummonds, Jr.

Enclosures

cc: Dale Johnson

Certificate of Service

I hereby certify that a copy of the foregoing letter and enclosures were hand-delivered this 13th day of January, 2003 to the following:

Alan R. Swendiman, Esquire
Jackson & Campbell
1120 20th Street, NW
Washington, DC 20036

Jeffrey W. Bolotin, Esquire
4604 Foxhall Crescents, NW
Washington, DC 20007

Neighbors Against Foxhall Gridlock
c/o Richard Aguglia, Esquire
Hunton & Williams
1900 K Street, NW, Suite 1200
Washington, DC 20006

Advisory Neighborhood Commission 3D
c/o John Finney, Chairman
5275 Watson Street, NW
Washington, DC 20016

Paul A. Tummonds, Jr.

Document #: 1298250 v.2

A

INBOUND VEHICULAR TRIP GENERATION – FIELD SCHOOL, FOXHALL ROAD, NW, WASHINGTON D.C.

(7:30 – 8:30 AM; DECEMBER 2 – DECEMBER 13, 2002)

Monday 12/02/02	Tuesday 12/03/02	Wednesday 12/04/02	Thursday 12/05/02	Friday 12/06/02
93	96	99	0	0

Monday 12/09/02	Tuesday 12/10/02	Wednesday 12/11/02	Thursday 12/12/02	Friday 12/13/02
0	92	3	97	98

Source: O. R. George & Associates, Inc.

Note: The information presented above is privileged and confidential, and is intended only for use by the Field School.

INBOUND VEHICULAR TRIP GENERATION – FIELD SCHOOL, FOXHALL ROAD, NW, WASHINGTON D.C.

(7:30 – 8:30 AM; NOVEMBER 4 – NOVEMBER 15, 2002)

Monday 11/04/02	Tuesday 11/05/02	Wednesday 11/06/02	Thursday 11/07/02	Friday 11/08/02
81	79	85	72	42

Monday 11/11/02	Tuesday 11/12/02	Wednesday 11/13/02	Thursday 11/14/02	Friday 11/15/02
3	79	64	70	75

Source: O. R. George & Associates, Inc.

Note: The information presented above is privileged and confidential, and is intended only for use by the Field School.

INBOUND VEHICULAR TRIP GENERATION – FIELD SCHOOL, FOXHALL ROAD, NW, WASHINGTON D.C.

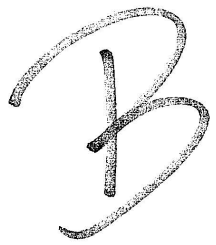
(7:30 – 8:30 AM; OCTOBER 21 – NOVEMBER 1, 2002)

Monday 10/21/02	Tuesday 10/22/02	Wednesday 10/23/02	Thursday 10/24/02	Friday 10/25/02
74	76	71	65	72

Monday 10/28/02	Tuesday 10/29/02	Wednesday 10/30/02	Thursday 10/31/02	Friday 11/01/02
72	70	68	73	80

Source: O. R. George & Associates, Inc.

Note: The information presented above is privileged and confidential, and is intended only for use by the Field School.



THE FIELD SCHOOL

Elizabeth C. Ely
Director

December 20, 2002

Dear Foxhall Community Neighbor,

The Field School has just completed its first semester on our new campus. We are enjoying being a part of the Foxhall community very much. The semester has gone very well, but with any new construction, there is generally some "tweaking" to do

After some rather hard rains in the fall, it became obvious that the soccer field needed to be re-constructed. It is therefore necessary to restrict the access of the community to our campus until the construction is completed and related potential hazards made safe.

In the interest of your personal safety, we ask that you remain off the property until we have informed you that construction is complete. The school has 24-hour security officers patrolling the premises who will be enforcing these restrictions as long as portions of the campus are still under construction. It is absolutely necessary that you stay off the property, as the school cannot be responsible for your safety under these conditions. We appreciate your understanding and cooperation.

We are looking forward to having our campus completely finished and being back to normal operating procedures. The school wishes you all a safe holiday season and a happy new year.

Sincerely,

Elizabeth C. Ely

Elizabeth C. Ely

2301 FOXHALL ROAD, NW ◆ WASHINGTON, DC 20007-1147

C

ShawPittman LLP

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September 10, 2002

By Hand Delivery

Mr. Geoffrey Griffis
Chairperson
District of Columbia Board of Zoning Adjustment
441 4th Street, NW, Room 210
Washington, DC 20001

Re: Proposed Shuttle Bus Routes as Requested by the Board of Zoning Adjustment ("Board") in BZA Order No. 16559-B

Dear Mr. Griffis:

On August 6, 2002, the Board requested that The Field School provide information regarding the proposed shuttle bus routes that will be used in transporting students from the Foxhall Road campus to the Friendship Heights, Foggy Bottom, Woodley Park and Cleveland Park Metro Stations. In addition, the Board asked The Field School to provide information regarding the routes that teachers and staff will to take to the Foxhall Road campus. (See BZA Order No. 16559-B, p. 11, Condition No. 8). This letter provides the requested information.

The Field School shuttle buses will take the following routes to the Metro stations (return trips will follow these same routes):

From the Cleveland Park Metro Station:
Connecticut Avenue (north) to
Van Ness Street (left turn) to
Nebraska Avenue (left turn) to
New Mexico Avenue (left turn), which turns into Tunlaw Road, to
37th Street (right turn) to
Reservoir Road (right turn) to
Foxhall Road (right turn) to the school.

From the Foxhall Road Campus to Woodley Park Metro Station (afternoons only):

Foxhall Road (northbound) to
Garfield Street (right turn) to
New Mexico Avenue (right turn) to
Garfield Street (left turn) to
Cleveland Avenue (right turn) to
Calvert Street (left turn) to the Metro station.

From the Friendship Heights Metro Station:

Western Avenue (westbound) to
River Road (left turn) to
Wisconsin Avenue (right turn) to
Van Ness Street (right turn) to
Nebraska Avenue (left turn) to
New Mexico Avenue (left turn), which turns into Tunlaw Road, to
37th Street (right turn) to
Reservoir Road (right turn) to
Foxhall Road (right turn) to the school.

From the Foggy Bottom Metro Station:

23rd Street around Washington Circle to
K Street (westbound) to the Whitehurst Freeway to
Canal Road (left turn) to
Macarthur Boulevard (right turn) to
Foxhall Road to the school.

Field School teachers and staff will take the following routes to the Foxhall campus:

All teachers and staff will be required to approach and leave the Foxhall Road campus via major arterial streets. In approaching the campus, all teachers and staff will arrive at the intersection of Reservoir and Foxhall Roads, turn onto Foxhall Road northbound and enter the campus. On leaving the campus, all teachers and staff will make a right turn out of the campus and head north on Foxhall Road.

If you have any questions or comments regarding this information. Please feel free to call the undersigned at (202) 663-8000.

Respectfully submitted,

Phil T. Feola

Paul A. Tummonds, Jr.

cc: DDOT, Ken Laden
Dale Johnson

ShawPittman LLP

Certificate of Service

I hereby certify that a copy of the foregoing letter and enclosures were mailed this 10th day of September, 2002 to the following:

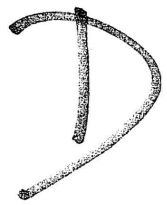
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1120 20th Street, NW
Washington, DC 20036

Jeffrey W. Bolotin, Esquire
4604 Foxhall Crescents, NW
Washington, DC 20007

Neighbors Against Foxhall Gridlock
c/o Richard Aguglia, Esquire
Hunton & Williams
1900 K Street, NW, Suite 1200
Washington, DC 20006

Advisory Neighborhood Commission 3D
c/o John Finney, Chairman
5275 Watson Street, NW
Washington, DC 20016

Paul A. Tummonds, Jr.



This invitation was sent on a large postcard.

December 2, 2002

Dear Neighbor,

You are cordially invited to attend a meeting at The Field School to discuss the first four months of the school's operations since opening in the Foxhall neighborhood on September 3rd of this year. We are very happy to be here and look forward to talking with you.

Please join us in the Cafritz house at 2301 Foxhall Road for light refreshments and conversation on the evening of Thursday, December 12th at 6:00 PM.

Sincerely,

Leah W. Schroeder
Director of External Relations

Please enter and leave the school by making a right turn only.