

Friends of Whitehaven

Post Office Box 5840

Washington, DC 20016

February 21, 2006

Mr. Geoffrey H. Griffis, Chair
Board of Zoning Adjustment
441 4th Street, NW, Suite 210-S
Washington, DC 20001

DC OFFICE OF ZONING

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RE: Statement of the Friends of Whitehaven regarding Application No.17429,
Friends of St. Patrick's Episcopal Day School LLC and St. Patrick's Episcopal
Church and Day School

Dear Chairman Griffis:

This statement is submitted by the Friends of Whitehaven (FOW), an organization that was established three years ago by neighbors concerned about the impact of development on Whitehaven Park and adjacent Glover-Archbold Park. FOW has demonstrated its concern over the health of these areas by their annual cleanups of the park and removal of invasive plants, which have drawn many volunteers from the community and schools. Over the years the Friends have raised concerns with National Park Service (NPS) and District Government officials over serious threats to this parkland -- particularly as the District continues to lose greenspace. In recent years, development at the edges of these parks has accelerated; hence the potential harm has increased.

In 2001, the National Capital Planning Commission included the following statement in the Comprehensive Plan for Parks, Open Spaces and National Features Element:

"The narrow threads of natural green areas throughout the District, like Whitehaven Parkway...Glover-Archbold Park...should be protected and maintained to provide green background and open space amenity for the residential areas of the city. These natural areas should be protected from border development that would adversely impact their natural resources and visual quality."

FOW urges the board to recognize the potential, if not the likelihood, of significant harm to the parks. Friends of Saint Patrick's (FOSP) has shown a clear inclination to develop this property for a school and housing development with a regard to the environmental issues. FOW applauds that effort. FOW believes much more can be done and by doing so, FOSP will demonstrate the best practice to protect the environment.

We strongly urge the Board to recognize that it also has a responsibility and an opportunity to diminish damage to the parks and larger regional watershed. We appreciate that the Board operates within a statute, but the essence of zoning regulation, as we understand it, is to reduce or eliminate in advance the negative effects of development.

BOARD OF ZONING ADJUSTMENT
District of Columbia

CASE NO.

17429

EXHIBIT NO.

52

Board of Zoning Adjustment
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We want to state what Board members surely appreciate: rain that falls on the FOSP property, flows across the land and into the park wetlands and streams that feed the Potomac River and the Chesapeake Bay. We all know the reports of continuing deterioration of the water quality in the Bay. Please expand your horizons and recognize your larger responsibility to help in this problem by incorporating the conditions listed below in the BZA Order that will be issued for Application No. 17429.

Southern Dell

FOSP plans to fill the southern dell with up to 17 feet of excavated material which will destroy the Palustrine Emergent Wetland. A stormwater discharge will be located approximately 25 feet from a stream designated as Waters of the United States which flows into Glover-Archbold Park. A massive 17 foot high retaining wall structure will define the eastern edge of the residential development.

- 1) FOW recommends that FOSP redesign the southern dell stormwater management system to preserve the Palustrine Emergent Wetland, provide a 25 foot buffer around the wetland, and establish easements for each property recorded with the District Recorder of Deeds.
- 2) A redesign might include installing the stormwater management system behind a five to six foot high retaining wall located at the edge of the 25 foot buffer, to allow the stormwater to slowly release into the biofiltration basin and palustrine emergent wetland.
- 3) FOSP plans to erect another massive 17 foot high retaining wall structure, between the springhouse and the 45th Street entrance, which will interfere with the flow of groundwater within the southern dell. The Board should require FOSP to reexamine the impact of this retaining wall on groundwater flow in the southern dell.

Northern Dell

The northern dell also presents a significant hydrologic problem because it directly impacts the Whitehaven wetlands. FOSP proposes to concentrate stormwater discharges at two points in the northern dell and one in the northeast corner of the property. FOW's main concern is the impact of stormwater road salts from the proposed development's roads on the adjacent NPS wetlands.

FOSP plans to use Filterra and sand filters, however no performance specifications have been provided regarding the treatment of road salts. In fact, Filterra systems do not remove road salts - road salts cause Filterra systems to fail, the soil media to clog, and the plants to die. This is compounded by plans for up to 50 percent site coverage in impermeable surfaces, and steep road gradients of up to 12 percent, which will increase stormwater runoff.

FOSP plans to erect a massive retaining wall, at least 23 feet high by the proposed Foxhall Road entrance, and to fill a portion of the northern dell with up to 16 feet of

excavated material for the sports field. The massive retaining wall and sports field fill will decrease the natural biofiltration and increase the undesirable sedimentation in the northern dell and adjacent wetlands.

- 4) FOW recommends incorporating other methods to reduce road salts and pollutants, such as biofiltration.
- 5) FOW recommends redesigning the stormwater discharges by installing discharge spreaders farther uphill, discharging the stormwater along the base of the proposed retaining wall, or employing other effective methods to allow more biofiltration.
- 6) FOW recommends a well defined conservation easement for the northern restricting construction, regrading, non-native plants, active sports, etc., in the northern dell.
- 7) FOW recommends that FOSP fully fund monthly stream monitoring on adjacent parklands, starting immediately, continuing through all construction, and concluding one year after completion of all construction. Stream monitoring could be provided by DOH-EHA, NPS Center for Urban Ecology, and /or Audubon Naturalist Society.

Additional conditions

- 8) FOSP will provide a complete set of full-sized development plans for public review at the Palisades Branch Public Library.
- 9) FOSP will design and build all houses and school buildings to be LEED Silver certified, or certifiable, and provide documentation for peer review. It is well established that buildings with green roofs reduce stormwater runoff and increase biofiltration.
- 10) FOSP will hold monthly meetings during the construction phase with ANC3D, FCCA, CHNA, FOW and other interested parties, develop an acceptable construction management plan, establish a 24-hour hotline, and address all concerns in a timely manner.
- 11) FOSP will remove all fencing within the public right-of-way along Foxhall Road.
- 12) FOSP will make plans available for review and comment by a low impact development (LID) consultant, and will incorporate LID recommendations into development plans.

Respectfully,



Kent Slowinski, Chair
Friends of Whitehaven