

1808 45th Street, NW
Washington, DC 20007

February 24, 2006

RECEIVED
D.C. OFFICE OF ZONING
2006 FEB 28 PM 1:57

Mr. Geoffrey Griffiths, Chairman
DC Board of Zoning Adjustment
441 4th Street, NW
Suite 210
Washington, DC 20001

Re: Application No. 17429, 1801 Foxhall Road, Friends of St. Patrick's LLC

Dear Chairman Griffiths:

Our home is located in the Colony Hill neighborhood, just south of the Hoban Road and 45th Street intersection, and within 200 feet of the subject property. We **oppose** the application of the Friends of St. Patrick's, LLC (FOSP) and St. Patrick's Episcopal Church and Day School. We have reviewed the materials that St. Patrick's has filed with the ANC to this point, and one or both of us has attended each ANC meeting and Foxhall Community Citizens Association (FCCA) meeting at which FOSP presented their plans. In addition, we engaged in discussions with FOSP in an attempt to have our concerns addressed.

We have become convinced that the proposed residential project will have a significant adverse effect on our home and neighborhood, as well as surrounding neighborhoods. In addition, the development of the school, without significant modifications to the current proposal, will be objectionable to nearby properties because of noise, traffic and deleterious environmental impacts. **Therefore, we respectfully ask that you oppose this application.**

The residential development plan will affect adversely the neighboring community. Colony Hill is a quiet residential development of single family homes in Northwest Washington DC. Most of the present houses were built in the 1930s by Harry Boss. The houses were designed by noted architect Horace W. Peaslee with landscaping by Rose Greely. The largest house lot is about 8500 square feet. The neighborhood is well shaded by mature trees and has well maintained gardens. Forty houses are in the neighborhood on three streets: Hoban Road, 45th Street and Hadfield Lane. Colony Hill is bordered by Glover Archbold Park on the east, the 1801 Foxhall Road property to the north, Foxhall Road to the west and Reservoir Road to the south. The 1801 Foxhall Road property is a 17 acre tract that has remained undeveloped to this point. Thus, Colony Hill, though bordered by two major commuter routes, has remained quiet and relatively free of traffic. Resident children learn to ride their bicycles in the streets of the

BOARD OF ZONING ADJUSTMENT
District of Columbia

CASE NO. 17429
EXHIBIT NO. 68

Board of Zoning Adjustment
District of Columbia
CASE NO. 17429
EXHIBIT NO. 68

neighborhood; neighbors congregate on the sidewalks and enjoy easy access to the trails of Glover Archbold Park.

We are interested in preserving the peaceful residential character of the neighborhood by seeing to it that existing zoning regulations are followed and enforced and that traffic in our area does not impact negatively on the character of the neighborhood or the quality of life of our neighbors. The FOSP plan to place the one point of ingress and egress to the residential development within the Colony Hill neighborhood is an unnecessary disruption of the stability, safety and traffic patterns of our community.

The environmental impacts of the proposed development are likely to affect adversely the neighboring property and create objectionable conditions. According to the applicant, half of the "special" trees currently on the site will be removed. In addition, and again according to the applicant, half of the surface of the site will be rendered impervious, raising stormwater management and water quality concerns. Apparently, the applicant's stormwater management system does not remove road salts. The discharge points of the stormwater system would likely affect adversely the wetland vegetation and conditions in the adjacent Whitehaven and Glover-Archbold Parks. We ask that the BZA give serious consideration to the concerns and recommendations offered by the DC Department of Health, Water Quality Division in addressing these issues and to protect wetlands on, and near the site.

The proposed school development plan is likely to be objectionable because of its inadequate traffic plan. Foxhall Road is currently a congested road, and appears to be at capacity. FOSP's traffic expert admits that the Foxhall/Reservoir intersection currently operates at the worst level of service possible, a LOS "F", during the morning peak hour, and at a near capacity level of service "E" during the school and commuter evening peak hours. FOSP's traffic management plan fails to mandate any mitigating behavior on St. Patrick's parents, students, faculty or staff so that vehicles from the school would not exacerbate this problem. The FOSP plan contains information about a carpool plan and the success of such plan in the past, and expresses the desire to work with other neighboring schools on a shuttle. Yet, these are merely strategies with no *required* behavior on the part of any St. Patrick's driver.

The Field School, located a mere three-tenths of a mile north on Foxhall, serves as a mostly successful model for traffic management on Foxhall Road. The BZA approved the school zoning exception **with vehicle and student enrollment caps**. The Field School is capped at 320 students and 106 inbound vehicle trips. St. Patrick's proposal calls for a school of 440 students and 100 faculty and staff members. As a new school with an unproven traffic management plan, **we ask that the BZA set firm enrollment and vehicle caps no higher than those imposed on the Field School and that would mandate St. Patrick's to demonstrate traffic management accountability.**

Colony Hill and the surrounding communities are saturated by schools: Field School to the north, Rock Creek International (at Foxhall and Q Street) to the south, Georgetown Day School on MacArthur Blvd., Lab School on Whitehaven and Reservoir, Our Lady of

Victory at Whitehaven and MacArthur, St. Patrick's current lower school on Whitehaven, and George Washington University at Mount Vernon, also on Whitehaven Pkwy. We are not opposed to schools, but they have created traffic congestion that is objectionable to us as residents of the residential community in which these schools are located. FOSP's current proposal contains no traffic enforcement mechanism that would bind the school to serious mitigation of the traffic engendered by the proposed school, and their plan, therefore is likely to become objectionable because of noise traffic and the number of students in attendance.

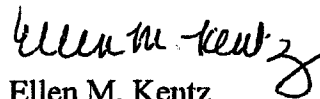
FOSP has materially underestimated the noise and nuisance that will be generated by its development. The proposed school will have at least 440 students and 100 faculty members, with no cap proposed. Its 170 new parking spaces will be nearly filled (164) by faculty and high school drivers every day according to their traffic study. The *only* playing field for the entire lower, middle, and upper school will be located right next to Hoban Road houses. It seems as if this field will be in constant use throughout the school day, including the after-school time to accommodate even a minimal high school sports program. The new buildings and theatre will be in demand for after hours and weekend activities. St. Patrick's currently operates a summer camp program on Whitehaven campus, and is an active parish that already sponsors a number of events and activities for parishioners. Many schools in the area have prohibitions on the use of lights on fields and outdoor sound amplification and on renting of facilities to outside groups, as well as limitations on the number and kind of extracurricular or non-school activities that may be held on school grounds. As examples, there should be an absolute ban on field lighting and use of a public address system at any time due to the school's location in a residential neighborhood. **Without reasonable but enforceable restrictions and limitations on the use of this facility and better sound protections, noise and traffic will have an adverse impact on the neighborhood.**

Unacceptable traffic generation or management, environmental concerns, noise, and nuisance are all bases for finding a project such as this objectionable under the zoning regulations. Area schools such as the Field School have been faced with hard choices about enrollment, busing, parking, and use, because of traffic generation, noise, and nuisance. St. Patrick's and FOSP need to hold itself to standards so that the school and residential development are not objectionable to the neighborhood. We respectfully request that you deny the application for special exceptions.

Sincerely,



Andrew W. Kentz



Ellen M. Kentz

FAX

TO: Geoffrey Griffiths, Chairman
DC Board of Zoning Adjustment

FROM: Andrew and Ellen Kentz
1808 45th Street, NW
Washington, DC 20007

RE: Application # 17429, 1801 Foxhall Road, NW
Hearing Date: February 28, 2006

202 727-6072

RECEIVED

D.C. OFFICE OF ZONING

2006 FEB 28 PM 1:57