


MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment

FROM: Joshua Mitchum, Development Review Specialist
 Joel Lawson, Associate Director, Development Review

DATE: February 20, 2025

SUBJECT: BZA Case 18431A – Modification with Hearing, Field School, 2301 Foxhall Rd. NW.

I. BACKGROUND

The Field School, in operation since 1972 in the District, previously operated in Dupont Circle until relocation to its current location at 2301 Foxhall Road NW. The Field School has received the following Board of Zoning Adjustment (BZA) approvals:

Order	Date	Activity
16599	December 19, 2000	Approval of a special exception to establish and operate a private school with a maximum of 320 students and 74 faculty/staff.
16599-A	August 6, 2001	Approval of a modification request to allow interim use of an existing building by nine staff members and for monthly board meetings.
16599-B	August 23, 2002	Approval of a modification request to modify Conditions Nos. 13-24 of BZA Order No. 16599, and the approval of an alternative Transportation Management Plan (TMP).
16599-C	May 12, 2004	Approval of a modification request to extend the duration of the alternative TMP of BZA Order No. 16599-B to March 31, 2003.
18431	December 28, 2012	Approval of a special exception to increase the student enrollment cap from 320 to 420, and to increase the faculty/staff cap from 74 to 110.

II. APPLICATION IN BRIEF

The Applicant (The Field School) requests approval to modify conditions of approval granted in BZA Order No. 18431, as well as modifications to its approved private school plan, which include:

- (1) construction of an addition (the “Innovation Center”);
- (2) installation of minor upgrades and improvements to the existing athletic field, including new lighting and scoreboard;
- (3) reconfiguration of the existing basketball court and parking areas to the north of the athletic field to create a new practice field;
- (4) reconfiguration of the school’s existing surface parking lot;
- (5) increase of the permitted student enrollment cap from 400 to 425; and
- (6) increase of approved full-time faculty and staff from 110 to 120.

Additionally, the Applicant requests approval of special exception relief to allow the construction of three retaining walls to be located on the west/northwest side of the side of the campus that will exceed the maximum height permitted by the Zoning Regulations.

III. OFFICE OF PLANNING RECOMMENDATION

The Office of Planning (OP) recommends **approval** of the requested modifications of the existing private school plan under BZA Order No. 18431 pursuant to Subtitle Y § 704, including:

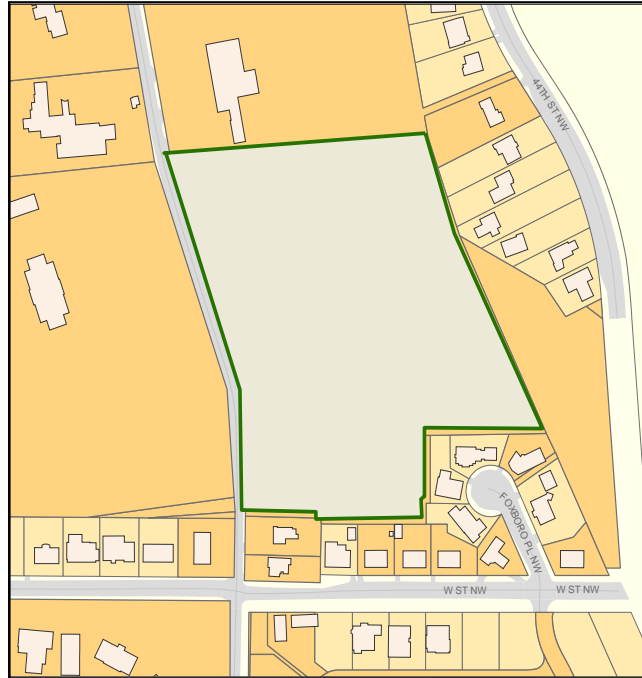
- Construction of a new addition, improvement of existing athletic field, reconfiguration of existing practice field, reconfiguration of existing surface parking lot, increase of maximum student enrollment cap, and the increase of maximum full-time faculty and staff cap.
- Modification to the Conditions of BZA Order No. 18431 as submitted per [Exhibit 26B](#) of the record, which reflect the timeline of completion and agreements between the Applicant and the ANC 3D.

The Office of Planning (OP) recommends **approval** of the following special exception pursuant to Subtitle C § 1402.1 and Subtitle X § 901:

- Retaining Walls C § 1401.2 (6 ft. max. required; 13 ft. 6 in., 11 ft. 6 in., 9 ft. 2 in. proposed)

IV. AREA AND SITE DESCRIPTION

Address	2301 Foxhall Road, NW
Legal Description	Square 1341, Lots 856, 861, 878, and 879
Ward/ANC	Ward 3, ANC 3D
Zoning	R-1A & R-1A/WH
Existing Development	The property is developed with The Field School buildings which house classrooms, academic offices, a 110-seat theater, and a 200-seat gymnasium, 117 parking spaces and two multipurpose, outdoor courts.
Historic District	None
Surrounding Neighborhood Character	The area surrounding the school is predominantly single-family detached residences, with some institutional uses such as the Mt. Vernon Campus of George Washington University to the southwest of the site.
Adjacent Properties	To the north is the Kreeger Museum; to the east and south are single family detached residences. Across Foxhall Road and to the west is the Belgian Embassy while to the northwest are the Spanish Embassy and the Foxhall Crescent single-family detached residences.



Site Location

V. ZONING REQUIREMENTS and RELIEF REQUESTED

R-1A Zone	Regulation	Existing	Proposed	Relief
Lot Width D § 202 (302)	75 ft. min.	290-727 ft.	No change	None requested
Lot Area D § 202	7,500 sq.ft. min.	459,962 sq.ft.	No change	None requested
Rear Yard D § 207	25 ft. min.	25 ft.	No change	None requested
Side Yard D § 207	8 ft. min. (2 side yards)	Not provided, appear to be more than 8 ft.	No change	None requested
Lot Occupancy D § 210	40% max. by right 50% max by sp.ex.	7.4%	10%	None requested
Retaining Walls Height C § 1401	6 ft. max.	N/A	Wall 1: 13 ft. 6 in. max. Wall 2: 11 ft. 6 in. max. Wall 3: 9 ft. 2 in. max.	Relief requested

VI. OFFICE OF PLANNING ANALYSIS

In this zone, private schools are permitted as a special exception use subject to the requirements outlined in Subtitle X § 104.1 and Subtitle U § 203.1(l).

Subtitle X § 104 PRIVATE SCHOOL PLAN

- 104.1 Education use by a private school shall be permitted as a special exception subject to review and approval by the Board of Zoning Adjustment after its determination that the use meets the applicable standards of Subtitle X, Chapter 9 and conditions of this section.*

The existing use of the property is a private school, which has been permitted via special exception pursuant to BZA Order No. 16559 and further modified by BZA Order No. 18431. The current proposed modifications to the private school plan would retain the private school use, and should continue to be in harmony with the purposes of the zoning regulations, which are to protect residential areas and promote a suitable environment for the surrounding community.

- 104.2 The private school shall be located so that it is not likely to become objectionable to adjoining and nearby property because of noise, traffic, number of students, or otherwise objectionable conditions.*

As previously stated, the building addition would be towards the interior of the site, and the practice field and parking lot reconfiguration would be located at the northern end of the property where the concentration of existing Field School buildings currently reside. Newly proposed and existing vegetative buffers should ensure that the proposed additions to the Field School campus would not be likely to become objectionable to surrounding and adjoining properties due to noise, traffic, or number of students.

The proposed change to the enrollment cap for students from 400 to 425 represents a six percent increase and the proposed change to the maximum faculty/staff from 110 to 120 represents a nine percent increase. Neither increase should substantially alter the property's ability to continue to operate as a private school in a non-objectionable manner.

- 104.3 The development standards for a private school shall be those of the zone in which the private school is located.*

The subject property is located in the R-1A Zone, and the Applicant has submitted plans and documentation that demonstrates compliance with the development standards of the R-1A Zone as stated in Subtitle D of the Zoning Regulations.

- 104.4 In calculating density, the land area shall not include public streets and alleys, but may include interior private streets and alleys within the school boundaries.*

The subject property does not feature public streets or alleys that could be used to calculate density.

General Special Exception Requirements of Subtitle X, Chapter 901.1

- i. Is the proposal in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps?*

Past BZA approvals for the operation of the subject private school indicate that the school has been deemed to be in harmony with the purpose and intent of the zoning regulations. As demonstrated, the proposal would allow the school to better serve the students and the school's needs.

- ii. Would the proposal appear to tend to affect adversely, the use of neighboring property?*

The requested modifications should not adversely affect the use of neighboring property as the increase should not cause any increase in noise from the school operations. The applicant has detailed how they have worked with the ANC and the surrounding community, and amended the proposal to address major concerns.

iii. The special exception will meet such special conditions as may be specified in this title.

As outlined in applicant filings and in this report, the proposal meets the conditions of Subtitle X, § 104 and Subtitle U, § 203 for a private school.

Subtitle U § 203 SPECIAL EXCEPTION USES – R-USE GROUPS A, B, AND C

203.1(m) Private schools and residences for teachers and staff of a private school, but not including a trade school, subject to the following conditions:

(1) Shall be located so that it is not likely to become objectionable to adjoining and nearby property because of noise, traffic, number of students, or otherwise objectionable conditions;

The proposed modifications to the existing private school plan should not introduce elements that would become objectionable to adjoining and nearby properties.

Noise

The proposed increase in the enrollment cap for students and the cap for full-time faculty and staff is minimal and should not lead to an increase in noise level that would be objectionable to adjoining or nearby properties.

The Applicant states that the proposed Innovation Center building addition would be constructed in accordance with the school's construction management plan, which aims to minimize objectionable noise during construction.

Furthermore, as shown on the submitted site plans, the school is currently set well back from its property lines, and there is an existing 100-foot vegetative buffer which provides additional screening from adjoining or nearby properties.

Traffic

OP notes that the school has an existing TDM program that includes private bus shuttles, carpooling, and staggered schedules for students. Furthermore, the existing site has adequate space for vehicle queuing and parking, which would mitigate potential spillover onto Foxhall Road.

The Applicant has provided a transportation statement (Exhibit 26C) assessing the impact of the cap increases for student enrollment and full-time faculty and staff. The transportation statement notes that this would generate an estimated 23 additional AM peak hour vehicle trips - 13 additional PM school peak hour trips, and 10 additional PM commuter peak hour trips. The statement concludes that the cap increases should not result in adverse impacts to the surrounding area. Full analysis of the traffic and the TDM program will be provided under separate cover from DDOT.

Other Objectionable Conditions

The Applicant is proposing to change Condition 31 of BZA Order No. 18431 to install exterior event lighting on the existing athletic field. As the school is located in a residential zone, The Applicant has submitted condition language that would limit the hours of operation for the lighting to no later than 9:00 PM daily and has pledged to respond to potential issues raised by community members and work to address them in good faith.

Furthermore, the Applicant has submitted a photometric plan detailing the specifications of the proposed lighting (Exhibit 26A). OP has reviewed the plans and has suggested to the Applicant that they submit an addendum to the photometric plan with a graphic depicting the estimated radius of light that would emit from the proposed fixtures.

- (2) Ample parking space, but not less than that required by this title, shall be provided to accommodate the students, teachers, and visitors likely to come to the site by automobile; and*
- (3) After hearing all evidence, the Board of Zoning Adjustment may require additional parking to that required by this title;*

The proposed increases in the full-time faculty and staff caps would require the school to provide a minimum of 124 parking spaces. As shown in the submitted plans, the school has proposed 129 parking spaces following the reconfiguration of the existing surface parking lot – thereby satisfying Zoning Regulation requirements. Subsequently, the Applicant has proposed the modification of a condition from the prior BZA Order No. 18431 to set a maximum number of spaces to 129.

Based on the Applicant's proposal, OP does not recommend additional parking for the subject application.

Subtitle C § 1402 SPECIAL EXCEPTION FROM RETAINING WALL REQUIREMENTS

1402.1 Retaining walls not meeting the requirements of this section may be approved by the Board of Zoning Adjustments as a special exception pursuant to Subtitle X. In addition to meeting the general conditions for being granted a special exception as set forth in that subtitle, the applicant must demonstrate that conditions relating to building, terrain, or surrounding area would make full compliance unduly restrictive, prohibitively costly, or unreasonable.

As shown on the submitted site plans, the subject property slopes steeply downward towards abutting homes fronting the western and southern property lines, which creates a grade change that requires the installation of retaining walls. These walls would be set well back from the street and from other properties.

The Applicant has submitted a study that shows two retaining wall designs (terraced and two-tiered) that could conform, or more-closely conform, to the requirements of Subtitle C § 1401.2. However, the study notes that a terraced design would be unfeasible due to it needing to encroach closer to adjacent properties as well as the potential impact to existing heritage trees. Furthermore, the study notes that a two-tiered design would not only require special exception relief, but it would also impact the 100-foot vegetative buffer and heritage trees on the site. As such, the proposed design requiring relief would not be highly visible

from any public way or other properties and would minimize site disturbances and loss of screening.

Subtitle X § 901 SPECIAL EXCEPTION REVIEW STANDARDS

901.2 The Board of Zoning Adjustment is authorized under § 8 of the Zoning Act, D.C. Official Code § 6-641.07(g)(2), to grant special exceptions, as provided in this title, where, in the judgment of the Board of Zoning Adjustment, the special exceptions:

- (a) *Will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps;*

The special exception, if granted, should be in harmony with the general purpose and intent of the R-1A Zone, which is to “protect quiet residential areas now developed with detached homes and adjoining vacant areas”, as well as “stabilize the residential areas and promote a suitable environment for family life”. The existing private school use is permitted in the R-1A Zone, and the proposed retaining wall relief should not compromise the site’s ability to continue functioning as a school operating consistently with the intent of the regulations in this zone.

- (b) *Will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps; and*

The proposed retaining walls should not adversely affect the use of neighboring property. None will encroach on abutting properties, and they will be placed as to not be highly visible from neighboring properties.

Furthermore, the Applicant has detailed their extensive efforts in receiving and implementing community feedback from neighboring properties through their design process and have committed to keeping communication open throughout the construction process should the requested approvals be granted.

- (c) *Will meet special conditions as may be specified in this title.*

The applicant has adequately addressed the conditions associated with relief from the retaining wall provisions.

VII. OTHER DISTRICT AGENCY COMMENTS

As of the date of this report, no other District agencies have provided comments on the subject application.

VIII. ADVISORY NEIGHBORHOOD COMMISSION COMMENTS

A report in support of the subject application from ANC 3D has been submitted into the record as Exhibit 27.

IX. COMMUNITY COMMENTS

As of the date of this report, no community members have provided comments on the subject application.