

FRIENDS OF THE FIELD

December 8, 2021
Re: BZA case 20643

Chairman Phil Mendelson
Council of the District of Columbia

Dear Chairman Mendelson:

We write on behalf of more than 200 neighbors who have serious concerns about Maret School's (Maret's) proposal to develop a five-acre sports complex in a residential (R-1-B) zoning district. Maret, the Applicant, based in Ward 3's Cleveland Park, has leased land for up to 50 years from the Episcopal Center for Children (ECC) in Ward 4. Maret intends to level the site and build regulation-size sports fields for their own teams and to sub-lease the facilities for others' use. This would be an unprecedented intervention in terms of intensity of scale and intensity of use. The project would have significant local, city-wide, and even regional impacts. We enumerate our concerns below, encouraging Council to seriously consider them, and reflect on Maret's request for zoning relief before the Board of Zoning Adjustment (BZA).

Broad environmental effects

We face a climate emergency, and Maret's proposal runs counter to District policies and aspirations expressed in the *Climate Ready DC* plan, which is aimed at increasing DC's resiliency in the face of climate change. The plan aligns with the Mayor's charge "to make the District of Columbia the healthiest, greenest, most livable city for all District residents." Maret's proposed intensive development would strip topsoil, nearly all trees, and all other natural wooded and grassy habitat from most of the five-acre site. They then intend to cover the scraped land with artificial turf and hardscape for playing fields and parking. The project would intensify the urban heat island effect, decrease green space and wildlife habitat, increase stormwater runoff volumes, exacerbate downstream erosion, and carry potentially contaminated runoff and micro-plastics into Rock Creek, the Potomac River, and the Chesapeake Bay.

Natural spaces buffer the intensity of heavy rainstorms. Even so, under current conditions, during heavy rains, the roadway of Nebraska Avenue becomes a torrent headed to a flooding Rock Creek Park, suggesting the underground stormwater system is already at capacity. Recent work by DDOT in the Oregon Avenue Watershed has included bio-retention cells (BMPs) and complete reconstruction of alleys adjacent to the site, with permeable pavers, gravel reservoirs, and under-drains. This investment in new infrastructure has paid off by detaining and retaining stormwater for slower dissipation and infiltration. Maret's proposal

would decrease the natural filtration and groundwater recharge currently provided by acres of topsoil and established vegetation, replacing them with an engineered solution inadequate to the task and requiring continual maintenance.

The District has forward-looking policies in place to restore and increase the tree canopy, and recognizes the benefits of parks and other green spaces as urban oases. The extent and diversity of the District's tree canopy is the envy of visitors, and of other cities who look to the District as an example. Washington ranks second behind New Orleans in tree coverage nationwide. The City partners with Casey Trees to continue increasing tree coverage. The value of trees for beauty, natural cooling, groundwater recharge, and other environmental services cannot be overstated. Yet of the 44 medium to large trees on the site, Maret proposes to remove all but four of them. They would attempt to transplant those to a far corner. With few large tracts of wooded, private land in the city, is this not counter-productive?

Inequitable city benefits

The Applicant's public outreach phase began September 27, 2021, with a presentation to ANC 3/4 G, in which Maret explained its proposal as resting on three legs: it would allow consolidation and expansion of Maret athletics; it would stabilize ECC's finances via lease payments; and it would create a "wonderful benefit" for the larger DC community, because Maret would sub-lease to others, such as youth soccer and baseball leagues.

That third leg of Maret's plan, the proposal to sub-lease facilities to the underserved youth of greater Washington, D.C., calls for careful consideration. With the intense calendar of use presented in Maret's BZA application, any benefits to the larger community would be outweighed by burdens placed on neighbors, the District, and the Federal government. Not only would there be broad environmental effects, as touched on above, but serious local impacts. These would undoubtedly include dramatically increased traffic volumes, with increased safety concerns, especially for the many young children living nearby. Parking pressures would intensify, and surface parking, tall retaining walls, fencing, and netting would be visually intrusive.

Maret cites a shortage of high-quality athletic fields throughout the City, and justifies their commercial proposal almost as philanthropy. If there is in fact a shortage of sports facilities such as they propose, and if building such facilities creates an inequitable, intrusive impact as we claim, could not the City do its part to advocate for well-planned and well-located sports centers to be shared more equitably? This could take place, perhaps, when large developments come under review. For example, at the Walter Reed site in Ward 4, and at the Armed Forces Retirement Home (Soldiers Home) and McMillan Reservoir sites nearby, could

consideration be given to shared athletic fields that would be equitable and less intrusive? The Soldiers Home, for example, has pre-existing sports fields. Could not Maret and other well-funded private interests contribute to the development of these facilities, providing a benefit to be shared more generally between teams and local neighborhoods?

The current proposal for ECC has echoes of the controversial extension of Maret's long-term lease for control of the Jelleff Recreation Center. In that case, when the Maret lease was renewed in 2019, the benefits from controlling a public facility continued to flow predominantly to Maret, leaving others disadvantaged. Hardy Middle School, for example, has only limited access to the public sports facility located right across the street. As currently outlined, the Maret sports complex at ECC would not be a neighborhood asset; instead, it would become a magnet for privileged access and use.

Unprecedented local impact

Single family homes border all sides of the ECC field along Nebraska and Utah Avenues, and Rittenhouse and 28th Streets, NW. In our review of the numerous sports fields in NW DC, none are so directly adjacent to so many neighboring homes. Existing sports fields have generous, and substantial buffers from vegetation, commercial activity, or streets to mitigate sound and visual impact. **To our knowledge no other sports fields in NW DC have been wedged into an established residential neighborhood in this manner.**

The ECC site has an elevation difference of 35 feet from west to east, and would require extensive cut and fill excavation to level it. Significant and visually intrusive retaining walls, fencing, and tall netting would be required to secure the site and prevent escaping baseballs, footballs, lacrosse, and soccer balls.

Everyday noise levels would, of course, far exceed the 60 dB maximum sound levels allowed in R-1-B zoning districts. Anyone who has attended any spirited sporting event knows that sound and noise cannot be kept to that acceptable level. Maret proposes a full calendar of use, for multiple sports, throughout the seasons, on most days of the year.

As mentioned briefly above, an expected large increase in traffic from the development would increase safety concerns. The most concentrated sports traffic would coincide with afternoon commute hours. A new curb cut proposed for Nebraska would create an exit from the sports complex parking lot directly onto a major cross-town artery. Sightlines for those exiting the lot, and for those using Nebraska Avenue, would be compromised by parked buses and the crest of a hill. The Nebraska Avenue corridor is used by daily commuters, bicyclists, and pedestrians, as it connects directly with Rock Creek Park, and indirectly with Silver Spring via Oregon Avenue and Wise Road. Oregon Avenue has been effectively closed for construction for

several years, but when it reopens, it is expected that commute volumes will return to their pre-construction, pre-pandemic levels and perhaps exceed them. Adding new after-school traffic, with numerous teen drivers behind the wheel, coinciding with the City's afternoon rush hour, would amplify a congested volatile traffic mix. The ECC site is only one mile from St. John's College High School, whose sports program already generates periodic high traffic volumes along Oregon Avenue.

Conclusion

Maret seeks to implant a business operation in a residential neighborhood. All benefits would flow to the Applicant, while costs and burdens would be externalized to neighbors, the City, and the Federal government.

We seek your help to assure a full evaluation of this unprecedented proposal. Specifically, we believe this proposal is unsuitable for this site because of the extent and intensity of land use, the proposed intensity of daily use, adjacency to established residences, and lack of physical, visual, or sound buffers.

We respectfully request assistance from your offices to:

1. Suggest OP / OZ develop measures needed to fully reveal details required to evaluate the proposal prior to approval and implementation. For example: How exactly would noise be mitigated? How exactly would stormwater runoff be managed? How much new traffic would be generated, and how much new parking would be required to avoid congesting neighborhood streets with unsupportable parking pressure? What materials exactly would be used for proposed retaining walls, fencing, and netting? How high would they extend, and exactly where would they be located?
2. Advocate for forward-thinking, environment-conserving practices when current District laws and regulations fall short of this goal. Is enough being done to implement the ambitious aims of the *Climate Ready DC* plan, and the *Sustainable DC 2.0 Plan*, for example?
3. Consider this project in view of the above comments and concerns, and in the spirit of preserving precious resources of natural vegetation and open space and maintaining public access to them for all District residents. We look to your leadership to manage environmental change sensitively, to keep our city looking forward, and oriented globally to slow the effects of climate change.

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Sincerely,

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Contact: friendsofthefield20015@gmail.com

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Ward 3 Councilmember Mary M. Cheh: mcheh@dccouncil.us

Ward 4 Councilmember Janeese Lewis George: jlewisgeorge@dccouncil.us

Ward 5 Councilmember Kenyan R. McDuffie: kmcduffie@dccouncil.us

Ward 6 Councilmember Charles Allen: callen@dccouncil.us

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Advisory Neighborhood Commission 3/4 G

ANC 3/4G-01 Commissioner Lisa R. Gore (Vice Chair): 3G01@anc.dc.gov

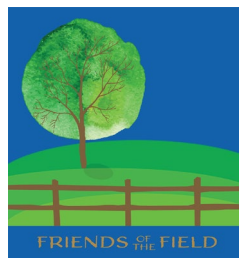
ANC 3/4G-02 Commissioner John K. Higgins (Treasurer): 3G02@anc.dc.gov

ANC 3/4G-03 Commissioner Randy Speck (Chair): Randy.Speck@anc.dc.gov

ANC 3/4G-04 Commissioner Michael Zeldin: 3G04@anc.dc.gov

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ANC 3/4G-06 Commissioner Peter Gosselin (Secretary): 3G06@anc.dc.gov



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FRIENDS OF THE FIELD

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Ward 4 Councilmember Janeese Lewis George
Council of the District of Columbia

Dear Councilmember Lewis George:

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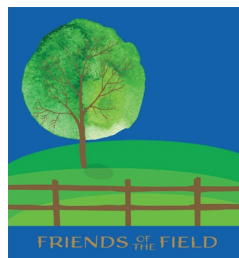
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FRIENDS OF THE FIELD

January 6, 2022

Re: **BZA case # 20643, Maret School**

Mr. Joel Lawson, Associate Director for Development Review
District of Columbia Office of Planning

Dear Mr. Lawson:

We write on behalf of more than 200 neighbors to thank you for your service to the City. We recognize you have a challenging assignment.

We would also like to bring to your attention a land-use proposal from the Maret School (Maret) that raises significant traffic and open space concerns. We write directly to you because the Office of Planning oversees the zoning process in which DDOT manages Comprehensive Transportation Review on behalf of the City and convenes the inter-agency Public Space Committee. Should the Maret proposal be approved by the Board of Zoning Adjustment (BZA), it would set a terrible city-wide precedent for residential neighborhoods by allowing intensive development, vastly increased traffic and parking pressure, and the loss of public space amenities.

We have organized what follows into three main sections:

- Principal Transportation Concerns,
- Principal Zoning and Open Space Concerns,
- Background of Broader Environmental Concerns

Principal transportation concerns

We have serious concerns about Maret's proposal to develop a large sports complex in an R-1-B residential zoning district. Maret, based in Ward 3's Cleveland Park, has applied for zoning relief to develop five acres of land leased from the Episcopal Center for Children (ECC), our neighbor in Ward 4. Applicant Maret intends to level nearly the entire site to build regulation-size sports fields for their own teams and to sub-lease the facilities to others on a regular basis. The lease could extend for up to 50 years.

Together with the complete physical transformation of the sloping, wooded site, the proposed schedule of games, practices, workshops, and summer camps would generate traffic and parking pressure completely at odds with residential zoning. The intent of R-1-B zoning is to protect and stabilize single-family neighborhoods suitable for family life.

Traffic study - volumes

We question the adequacy of the transportation study being conducted by Wells + Associates. We have not yet seen the scoping agreement for this study. From preliminary indications, it appears to focus on only four nearby intersections, and misses much.

Nebraska Avenue, which defines the southern limits of the subject property, intersects with Oregon Avenue, which has been completely rebuilt over several years. Oregon will reopen soon, reestablishing a cross-town commuter route to Silver Spring and beyond. The new and improved Oregon can be expected to carry higher traffic volumes than in the pre-construction, pre-pandemic period. Analyzing these likely higher volumes could be complicated due to uncertainty around the future reopening – or continuing closure – of the National Park Service's Bingham Drive and Beach Drive in Rock Creek Park. Wells' preliminary study is silent on these considerations.

Daily commuter traffic concentrated on Nebraska Avenue east of Utah, immediately adjacent to the proposed sports complex, would come into conflict with peak athletic traffic and peak ECC traffic during afternoon and early evening hours. The Wells study (again, based on early indications) does not take ECC traffic into account. (ECC proposes to reopen as a school after-school childcare program in Fall 2022.) Wells' study also does not account for traffic at times of changeover for users of the proposed athletic fields. As one game or set of games ends, and another begins, consideration must be given to allow adequate time to clear the site and roadways.

Traffic study - multimodal access and safety

We question the adequacy of the traffic study's analysis of multimodal access and safety. Preliminary indications are that only vehicular level of service was considered in assessing trip generation and intersection performance. There was no mention of bicycle or pedestrian level of service, even though the skeletal Transportation Demand Management (TDM) plan calls for encouraging bicycle, pedestrian, and transit access. There are currently no dedicated bicycle facilities in the vicinity of the proposed sports complex. There is only one commuter bus line directly serving the site, the M4, and that runs only on weekdays. The TDM plan, consisting of a few bike racks and a Capital Bikeshare station, would be inadequate to blunt the predictable impact of private vehicle access by potentially hundreds of sports families.

Safety, especially for children and seniors currently living in an area characterized by mostly quiet, low-speed, low-volume streets, must be given a higher priority. Cut-through traffic could become a serious hazard. For example, 28th Street NW, a one-block connector between Nebraska and Rittenhouse, would become an attractive alternative for those wishing to avoid signalized intersections or looking for on-street parking. Potential traffic hazards would likely be worsened by a preponderance of relatively inexperienced teen drivers.

Traffic study - other considerations

Nebraska Avenue alone calls for serious, detailed study. There are three existing curb cuts to the ECC property clustered on the north side of Nebraska between 28th Street and Utah Avenue. The south side of Nebraska has numerous driveway curb cuts between Utah and Oregon serving single-family residences. Conflicts abound.

Sight lines on Nebraska are obstructed by the crest of a hill at the approximate location proposed for a new curb cut and parking entrance. Visibility would be further compromised by proposed bus lay-bys at the north curb, at both sides of the proposed new entrance.

Nebraska serves many pedestrians and bicycles. Existing sidewalks define and protect the pedestrian route, especially important for children walking to nearby Lafayette Elementary School. Although there are no dedicated bicycle facilities, Nebraska is popular with people on bicycles. It serves significant numbers of commuter and recreational cyclists and is a popular and natural gateway to Rock Creek Park. Adding significant new traffic volumes in this corridor would worsen this volatile mix of bicyclists, pedestrians, and cars. This would especially be the case at times when the fields are proposed to be used by others, unfamiliar with the area, arriving by private car.

This neighborhood is already home to St. John's College High School. When St. Johns hosts home games, traffic congestion snarls not only the immediate vicinity, but Oregon Avenue and Military Road all the way east to 16th Street. Permitting the establishment of an *additional* high school sports program on Nebraska Avenue, only a mile away, with football, soccer, baseball, and lacrosse calendars, plus the activities of other leagues, teams, and clubs, would compound congestion and delays already evident from St. Johns' sports traffic.

Principal open space and zoning concerns

Maret seeks zoning relief to allow parking for 50 or more cars in the "front yard" of the property fronting Nebraska Avenue. Allowing this would be highly unusual in an R-1-B zoning district. Alternatively, allowing unrestricted on-street parking would likely overwhelm available curbside parking for residents and other neighborhood visitors. Parking on Nebraska is limited by the large number of residential driveways, crosswalks, and existing ECC curb cuts.

This proposal would introduce the first significant commercial activity in the entire portion of Ward 4 west of Rock Creek Park, namely the Hawthorne, Barnaby Woods, and Chevy Chase DC neighborhoods. At present, the only business activity in this entire area is a single retail corner store, Broad Branch Market, a small grocery and deli near Lafayette Elementary School. There is no other commercial establishment between Rock Creek Park and the Connecticut Avenue corridor. To introduce Maret's proposed sports complex in this environment would overturn decades of precedent.

Maret has made clear that they would seek to maximize the leased use of the sports fields. *The incentives align to benefit the applicant, and all the burdens of the proposed activity would be placed on neighbors, the larger community, the City, and federal lands downstream (including Rock Creek Park).*

This unprecedented imposition would require the elimination of almost all existing tree cover. More than 40 trees would be destroyed; transplanting of four heritage trees would be attempted; and the retention of a further three heritage trees has been proposed. Two of these three trees are in or near the Nebraska Avenue "front yard" of interest to DDOT. These trees would almost certainly be threatened by the proposed deep excavation and construction to level the field and create the large rain garden. Wholesale gouging of the hillside and the significant

reduction and loss of trees would leave adjacent residential properties virtually unprotected from noise and disturbance from the sports complex. Similar fields in the City shield their neighbors with more substantial buffers, typically including commercial buildings, major roadways, or dense vegetation. Such buffering requires space unavailable at this site.

In addition to reducing the public space amenities of peaceful, attractive, naturally wooded open space, the Maret proposal would impose visually intrusive tall retaining walls, hardscape for parking, and high perimeter fencing and netting reaching heights of 20 feet or more above the playing surfaces

Background of broader environmental concerns

We would like to position the issues enumerated above against a background of broad environmental concerns.

We face a climate crisis and believe Maret's proposed sports complex would be at odds with city-wide policies, as spelled out in the *Climate Ready DC*, and *Sustainable DC 2.0* plans. These documents seek to implement the Mayor's charge "to make the District of Columbia the healthiest, greenest, most livable city for all District residents."

The Maret proposal would denude an existing wooded hillside, diminish the tree canopy, and reduce the environmental services it provides.

The Maret proposal would encourage virtually unlimited access by private vehicles, contributing to congestion, parking pressure, and continuing fossil fuel use.

The Maret proposal would add untold volumes of additional stormwater runoff to the City's already locally overloaded stormwater system. The Oregon Avenue sub-watershed where ECC is located, part of the Rock Creek watershed, benefited from a 2019 DDOT Low Impact Development project. That project added large quantities of pervious alley pavement and significant numbers of green infrastructure BMP bio-retention cells. Their contribution to reducing the load on the MS4 system would likely be overwhelmed by additional runoff piped into the system from Maret's artificial turf playing fields.

The proposed use of artificial turf is itself questionable. For example, nearby Montgomery County prefers natural turf grass playing fields with enhanced drainage. This approach increases the amount of time the fields can be used and avoids the negative environmental consequences of adding acres of artificial surface in sensitive watersheds. Maret proposes artificial turf as a means of maximizing use of the playing fields. But this choice would maximize noise and disturbance for neighbors. Moreover, it would introduce massive quantities of synthetic material immediately upstream from Rock Creek. Even the most durable artificial turf products need to be removed and replaced every eight to ten years. The embodied energy of this manufacturing, installation, and replacement activity has yet to be calculated. A recent report in the *New York Times* "Wirecutter" feature concluded that it was impossible to recommend any synthetic turf products because of the environmental and health consequences.

Summary and Conclusion

We seek your help to assure a full evaluation of this unprecedented proposal. Specifically, we believe this proposal is unsuitable for this site because of the extent and intensity of land use, the proposed intensity of daily use, and adjacency to established residences. The traffic that would ensue must be clearly documented and understood.

We respectfully request assistance from your offices to:

1. Fully evaluate the proposal. For instance, how much new traffic would be generated, and how much new parking would be required to avoid congesting neighborhood streets with unsupportable parking pressure? What is the tipping point?
2. Advocate for forward-thinking, environment-conserving transportation practices when current District laws and regulations fall short of this goal.
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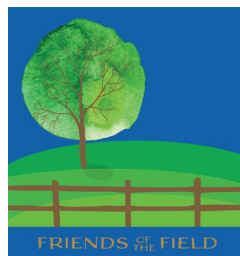
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FRIENDS OF THE FIELD

January 6, 2022

Re: **BZA case # 20643, Maret School**

Ms. Jennifer Steingasser, Deputy Director
Development Review & Historic Preservation
District of Columbia Office of Planning

Dear Ms. Steingasser:

We write on behalf of more than 200 neighbors to thank you for your service to the City. We recognize you have a challenging assignment.

We would also like to bring to your attention a land-use proposal from the Maret School (Maret) that raises significant traffic and open space concerns. We write directly to you because the Office of Planning oversees the zoning process in which DDOT manages Comprehensive Transportation Review on behalf of the City and convenes the inter-agency Public Space Committee. Should the Maret proposal be approved by the Board of Zoning Adjustment (BZA), it would set a terrible city-wide precedent for residential neighborhoods by allowing intensive development, vastly increased traffic and parking pressure, and the loss of public space amenities.

We have organized what follows into three main sections:

- Principal Transportation Concerns,
- Principal Zoning and Open Space Concerns,
- Background of Broader Environmental Concerns

Principal transportation concerns

We have serious concerns about Maret's proposal to develop a large sports complex in an R-1-B residential zoning district. Maret, based in Ward 3's Cleveland Park, has applied for zoning relief to develop five acres of land leased from the Episcopal Center for Children (ECC), our neighbor in Ward 4. Applicant Maret intends to level nearly the entire site to build regulation-size sports fields for their own teams and to sub-lease the facilities to others on a regular basis. The lease could extend for up to 50 years.

Together with the complete physical transformation of the sloping, wooded site, the proposed schedule of games, practices, workshops, and summer camps would generate traffic and parking pressure completely at odds with residential zoning. The intent of R-1-B zoning is to protect and stabilize single-family neighborhoods suitable for family life.

Traffic study - volumes

We question the adequacy of the transportation study being conducted by Wells + Associates. We have not yet seen the scoping agreement for this study. From preliminary indications, it appears to focus on only four nearby intersections, and misses much.

Nebraska Avenue, which defines the southern limits of the subject property, intersects with Oregon Avenue, which has been completely rebuilt over several years. Oregon will reopen soon, reestablishing a cross-town commuter route to Silver Spring and beyond. The new and improved Oregon can be expected to carry higher traffic volumes than in the pre-construction, pre-pandemic period. Analyzing these likely higher volumes could be complicated due to uncertainty around the future reopening – or continuing closure – of the National Park Service's Bingham Drive and Beach Drive in Rock Creek Park. Wells' preliminary study is silent on these considerations.

Daily commuter traffic concentrated on Nebraska Avenue east of Utah, immediately adjacent to the proposed sports complex, would come into conflict with peak athletic traffic and peak ECC traffic during afternoon and early evening hours. The Wells study (again, based on early indications) does not take ECC traffic into account. (ECC proposes to reopen as a school after-school childcare program in Fall 2022.) Wells' study also does not account for traffic at times of changeover for users of the proposed athletic fields. As one game or set of games ends, and another begins, consideration must be given to allow adequate time to clear the site and roadways.

Traffic study - multimodal access and safety

We question the adequacy of the traffic study's analysis of multimodal access and safety. Preliminary indications are that only vehicular level of service was considered in assessing trip generation and intersection performance. There was no mention of bicycle or pedestrian level of service, even though the skeletal Transportation Demand Management (TDM) plan calls for encouraging bicycle, pedestrian, and transit access. There are currently no dedicated bicycle facilities in the vicinity of the proposed sports complex. There is only one commuter bus line directly serving the site, the M4, and that runs only on weekdays. The TDM plan, consisting of a few bike racks and a Capital Bikeshare station, would be inadequate to blunt the predictable impact of private vehicle access by potentially hundreds of sports families.

Safety, especially for children and seniors currently living in an area characterized by mostly quiet, low-speed, low-volume streets, must be given a higher priority. Cut-through traffic could become a serious hazard. For example, 28th Street NW, a one-block connector between Nebraska and Rittenhouse, would become an attractive alternative for those wishing to avoid signalized intersections or looking for on-street parking. Potential traffic hazards would likely be worsened by a preponderance of relatively inexperienced teen drivers.

Traffic study - other considerations

Nebraska Avenue alone calls for serious, detailed study. There are three existing curb cuts to the ECC property clustered on the north side of Nebraska between 28th Street and Utah

Avenue. The south side of Nebraska has numerous driveway curb cuts between Utah and Oregon serving single-family residences. Conflicts abound.

Sight lines on Nebraska are obstructed by the crest of a hill at the approximate location proposed for a new curb cut and parking entrance. Visibility would be further compromised by proposed bus lay-bys at the north curb, at both sides of the proposed new entrance.

Nebraska serves many pedestrians and bicycles. Existing sidewalks define and protect the pedestrian route, especially important for children walking to nearby Lafayette Elementary School. Although there are no dedicated bicycle facilities, Nebraska is popular with people on bicycles. It serves significant numbers of commuter and recreational cyclists and is a popular and natural gateway to Rock Creek Park. Adding significant new traffic volumes in this corridor would worsen this volatile mix of bicyclists, pedestrians, and cars. This would especially be the case at times when the fields are proposed to be used by others, unfamiliar with the area, arriving by private car.

This neighborhood is already home to St. John's College High School. When St. Johns hosts home games, traffic congestion snarls not only the immediate vicinity, but Oregon Avenue and Military Road all the way east to 16th Street. Permitting the establishment of an *additional* high school sports program on Nebraska Avenue, only a mile away, with football, soccer, baseball, and lacrosse calendars, plus the activities of other leagues, teams, and clubs, would compound congestion and delays already evident from St. Johns' sports traffic.

Principal open space and zoning concerns

Maret seeks zoning relief to allow parking for 50 or more cars in the "front yard" of the property fronting Nebraska Avenue. Allowing this would be highly unusual in an R-1-B zoning district. Alternatively, allowing unrestricted on-street parking would likely overwhelm available curbside parking for residents and other neighborhood visitors. Parking on Nebraska is limited by the large number of residential driveways, crosswalks, and existing ECC curb cuts.

This proposal would introduce the first significant commercial activity in the entire portion of Ward 4 west of Rock Creek Park, namely the Hawthorne, Barnaby Woods, and Chevy Chase DC neighborhoods. At present, the only business activity in this entire area is a single retail corner store, Broad Branch Market, a small grocery and deli near Lafayette Elementary School. There is no other commercial establishment between Rock Creek Park and the Connecticut Avenue corridor. To introduce Maret's proposed sports complex in this environment would overturn decades of precedent.

Maret has made clear that they would seek to maximize the leased use of the sports fields. *The incentives align to benefit the applicant, and all the burdens of the proposed activity would be placed on neighbors, the larger community, the City, and federal lands downstream (including Rock Creek Park).*

This unprecedented imposition would require the elimination of almost all existing tree cover. More than 40 trees would be destroyed; transplanting of four heritage trees would be attempted; and the retention of a further three heritage trees has been proposed. Two of these three trees are in or near the Nebraska Avenue "front yard" of interest to DDOT. These trees

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In addition to reducing the public space amenities of peaceful, attractive, naturally wooded open space, the Maret proposal would impose visually intrusive tall retaining walls, hardscape for parking, and high perimeter fencing and netting reaching heights of 20 feet or more above the playing surfaces

Background of broader environmental concerns

We would like to position the issues enumerated above against a background of broad environmental concerns.

We face a climate crisis and believe Maret's proposed sports complex would be at odds with city-wide policies, as spelled out in the *Climate Ready DC*, and *Sustainable DC 2.0* plans. These documents seek to implement the Mayor's charge "to make the District of Columbia the healthiest, greenest, most livable city for all District residents."

The Maret proposal would denude an existing wooded hillside, diminish the tree canopy, and reduce the environmental services it provides.

The Maret proposal would encourage virtually unlimited access by private vehicles, contributing to congestion, parking pressure, and continuing fossil fuel use.

The Maret proposal would add untold volumes of additional stormwater runoff to the City's already locally overloaded stormwater system. The Oregon Avenue sub-watershed where ECC is located, part of the Rock Creek watershed, benefited from a 2019 DDOT Low Impact Development project. That project added large quantities of pervious alley pavement and significant numbers of green infrastructure BMP bio-retention cells. Their contribution to reducing the load on the MS4 system would likely be overwhelmed by additional runoff piped into the system from Maret's artificial turf playing fields.

The proposed use of artificial turf is itself questionable. For example, nearby Montgomery County prefers natural turf grass playing fields with enhanced drainage. This approach increases the amount of time the fields can be used and avoids the negative environmental consequences of adding acres of artificial surface in sensitive watersheds. Maret proposes artificial turf as a means of maximizing use of the playing fields. But this choice would maximize noise and disturbance for neighbors. Moreover, it would introduce massive quantities of synthetic material immediately upstream from Rock Creek. Even the most durable artificial turf products need to be removed and replaced every eight to ten years. The embodied energy of this manufacturing, installation, and replacement activity has yet to be calculated. A recent report in the *New York Times* "Wirecutter" feature concluded that it was impossible to recommend any synthetic turf products because of the environmental and health consequences.

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We seek your help to assure a full evaluation of this unprecedented proposal. Specifically, we believe this proposal is unsuitable for this site because of the extent and intensity of land use, the proposed intensity of daily use, and adjacency to established residences. The traffic that would ensue must be clearly documented and understood.

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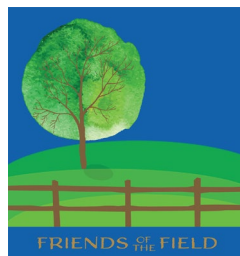
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FRIENDS ^{OF} THE FIELD

January 6, 2022

Re: **BZA case # 20643, Maret School**

Mr. Everett Lott, Director
District of Columbia Department of Transportation

Dear Director Lott:

We write on behalf of more than 200 neighbors to welcome you to your new role as Director of DDOT. We wish you the very best and thank you for taking on such a challenging role.

We would also like to bring to your attention a land-use proposal from the Maret School (Maret) that raises significant traffic and open space concerns. We write directly to you because DDOT manages Comprehensive Transportation Review on behalf of the City and convenes the inter-agency Public Space Committee. Should the Maret proposal be approved by the Board of Zoning Adjustment (BZA), it would set a terrible city-wide precedent for residential neighborhoods by allowing intensive development, vastly increased traffic and parking pressure, and the loss of public space amenities.

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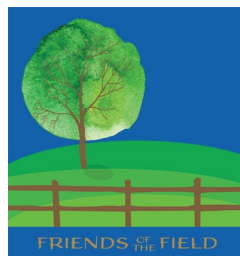
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FRIENDS OF THE FIELD

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Re: **BZA case # 20643, Maret School**

Mr. Aaron Zimmerman
Site Development Program Manager
District Department of Transportation

Dear Mr. Zimmerman:

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The Maret proposal would denude an existing wooded hillside, diminish the tree canopy, and reduce the environmental services it provides.

The Maret proposal would encourage virtually unlimited access by private vehicles, contributing to congestion, parking pressure, and continuing fossil fuel use.

The Maret proposal would add untold volumes of additional stormwater runoff to the City's already locally overloaded stormwater system. The Oregon Avenue sub-watershed where ECC is located, part of the Rock Creek watershed, benefited from a 2019 DDOT Low Impact Development project. That project added large quantities of pervious alley pavement and significant numbers of green infrastructure BMP bio-retention cells. Their contribution to reducing the load on the MS4 system would likely be overwhelmed by additional runoff piped into the system from Maret's artificial turf playing fields.

The proposed use of artificial turf is itself questionable. For example, nearby Montgomery County prefers natural turf grass playing fields with enhanced drainage. This approach increases the amount of time the fields can be used and avoids the negative environmental consequences of adding acres of artificial surface in sensitive watersheds. Maret proposes artificial turf as a means of maximizing use of the playing fields. But this choice would maximize noise and disturbance for neighbors. Moreover, it would introduce massive quantities of synthetic material immediately upstream from Rock Creek. Even the most durable artificial turf products need to be removed and replaced every eight to ten years. The embodied energy of this manufacturing, installation, and replacement activity has yet to be calculated. A recent report in the *New York Times* "Wirecutter" feature concluded that it was impossible to recommend any synthetic turf products because of the environmental and health consequences.

Summary and Conclusion

We seek your help to assure a full evaluation of this unprecedented proposal. Specifically, we believe this proposal is unsuitable for this site because of the extent and intensity of land use, the proposed intensity of daily use, and adjacency to established residences. The traffic that would ensue must be clearly documented and understood.

We respectfully request assistance from your offices to:

1. Fully evaluate the proposal. For instance, how much new traffic would be generated, and how much new parking would be required to avoid congesting neighborhood streets with unsupportable parking pressure? What is the tipping point?
2. Advocate for forward-thinking, environment-conserving transportation practices when current District laws and regulations fall short of this goal.
3. Consider this project in view of the above comments and concerns as setting a precedent in our city. Should traffic and congestion of this magnitude even be reconsidered for an R-1-B zoned residential neighborhood?

We look to your leadership to manage this kind of radical change to lessen disruption of our community's structure and systems.

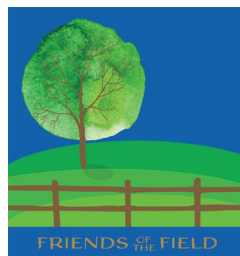
We look to your leadership to speak for the city and its residents.

Sincerely,

Friends of the Field

Contact: friendsofthefield20015@gmail.com

Attachment: Maret conceptual site plan showing ECC, the density of use and the surrounding single-family residences.



Friends of the Field, an alliance of Chevy Chase neighbors, families, and concerned citizens, cares about safety, environmental stewardship, and quality neighborhood life. We work for transparent due process, inclusiveness, and thoughtful use of precious green space.