

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

October 28, 2021

Dear Mr. Lawson,

We write as representatives of a large group of residents extremely concerned about the impact that a proposal from the Maret School (Maret) would have on the environmental qualities of our neighborhood, if realized

Maret proposes to develop a 5+/-acre sports complex on the grounds of the Episcopal Center for Children (ECC) in Chevy Chase at the corner of Utah and Nebraska Avenues NW. ECC has executed a long-term lease with Maret (for up to 50 years) that would replace natural wooded and grassy open space with nearly 4 acres of artificial turf for multi-season, multi-sports use by Maret and others. Maret would lease facilities to unknown numbers of other entities, including youth sport groups such as DC Soccer.

The impact on neighbors and the City would be substantial and undesirable. This proposal would benefit exclusively Maret, ECC, and others leasing space, and would leave neighbors, the District, and the Federal government to deal with the repercussions. Consequences would include all the impacts of significant excavation and regrading, dawn to dusk noise from sports activities for most months of the year, traffic and parking pressure, loss of natural habitat, disruption of sub-surface water courses, stormwater management burdens, and the migration of potential pollutants and contaminants from this site directly downstream to Rock Creek Park and Rock Creek.

We appeal to the Office of Planning to:

1. Help us obtain the full disclosure of the project. To date, our ANC 3/4G leadership has not been responsive. The neighborhood has written a long letter to the ANC, Maret and ECC, and await a reply to our questions posed.
2. A full review of this proposed intervention, as we see no evidence that it is receiving the level of scrutiny appropriate for a major intervention in an entirely residential neighborhood.
3. Provide direction regarding the evaluation process that would take account of our concerns and issues.
4. Help us conceive how the land might be better used for something far less invasive and intrusive. How might the many positive aspects of the ECC property be allowed to contribute qualitatively to this neighborhood and the larger community? Can Maret School be steered to a less-disruptive solution in another part of the city, so that the environmental services of this place can be guarded: peace and quiet, the wooded natural habitat, groundwater recharge and natural resilience?

In what follows, significant impacts are enumerated. Our comments are in line with the Office of Planning's *Sustainable DC* Initiative, which aims to "make the District of Columbia the healthiest, greenest, most livable city for all District residents". In particular, we object to the proposed development as it would not "be in harmony with the general purpose and intent of the zoning regulations and zoning maps and [...] **not tend to affect adversely the use of neighboring properties.**"

1. **Removal of Natural Vegetation.** This parcel of land is currently carpeted with grasses and vegetation including mature and heritage trees. The Maret plan would remove trees,

dramatically reshape the site, and relocate “healthy” trees. In place of natural turf grasses, Maret proposes nearly 3.7 acres of artificial turf, with additional hardscape for parking and circulation, and with some perimeter (not yet specified) natural vegetation. There would be a heat island effect from this combination of artificial turf, hardscape elements, and loss of cooling from plant materials. The article *Turf War* (Bethesda Magazine 11-18-2019) claims that with outdoor air temperatures in the upper 80s, artificial turf temperatures approach 140 degrees. Hardscape for parking and bus lay-bys would add additional heat stresses.

2. **Artificial Materials.** The artificial turf brand name, composition, and substrate have not been disclosed. For the Oregon Avenue watershed, where the District has made significant long-term investments in recent years, it would replace natural resilient soil profiles with completely artificial ground cover, gravel and undisclosed drainage designs. From all accounts, artificial turf requires complete replacement on a maximum 10-year life cycle. The exact composition of artificial turf is also at issue. Some material used to cushion the artificial grass fibers are themselves risky, whether crumb rubber or powdered minerals. What goes into the air, the water, immediately adjacent properties, and the lungs and skin of young athletes?
3. **Extensive Excavation and Regrading.** The proposed site is sloping ground, with a drop of approximately 33 feet from the western limit to the eastern limit. To flatten the nearly 5-acre area to accommodate the sports complex would require extensive cut and fill excavation. It is likely that the developers would cut from the high points, fill the low points, and build retaining walls approximately 16-feet tall at both the cut and the fill sites. Very high retaining walls on the East side of the site would be at or very near the property line, very close to neighboring houses. This is not yet mentioning the visual impact of tall perimeter netting to control foul errant balls from lacrosse, soccer, baseball, and football. The exact location and extent of these have not been disclosed, but they could reach a height of 25 feet or more.
4. **Stormwater Management.** It is unclear how stormwater will be managed on many acres of artificial turf. There are substantial challenging runoff and drainage conditions under the current lay of the land. The site is directly uphill (upstream) from Rock Creek Park and Rock Creek. Reducing natural recharge would tax the already over-loaded storm water system. During any kind of heavy rain, Nebraska Avenue becomes a torrent headed to Rock Creek Park, suggesting the underground stormwater system is already at capacity. Recent remedial work in the immediate vicinity has included bio-retention cells (BMPs) and complete reconstruction of adjacent alleys with under-drains and permeable pavers. These have been functioning well to detain and retain stormwater at the current rates.
The single sketch Maret has so far provided shows a large “bio-retention” feature in the Southeast corner of the site, that would be more than double the size of the immediately adjacent house. Not only are the mechanics of such a large potential pond or field unknown, there could also be health consequences from particulates, pollutants, seepage, mosquitoes and other pests.
5. **Habitat Loss.** Granting that this area is very near Rock Creek Park, it is a haven for birds and animals. Hawks and owls are regularly spotted, together with numerous other bird species, foxes, raccoons, and opossums. Maret’s stated intent to fence the perimeter and install tall netting is out of keeping with the spirit of preserving habitat and stewardship of natural resources.

6. **Noise.** The maximum allowable sound level in this neighborhood zoning is 60 dB. Sports activities regularly exceed this limit. A recent pickup soccer game of 15 young players on the ECC fields registered sound levels over 90 dB on a NIOSH / CDC meter from a home a hundred yards away. How would sports noise be regulated and controlled to avoid unallowable sound levels?
7. **Public Transportation and Parking Footprint.** The site is not well-served by public transportation for the proposed use and expected occupancy. There is one commuter bus line (the M4) that runs along Nebraska and Utah Avenues. It does not run on week-ends. Travel to this site would be almost exclusively by private car. Maret, only one of the users, suggests they might use buses for their students. Traffic and street parking pressure would be significantly increased for the multi-season, multi-use sports complex. The 50 spaces proposed as part of the sports complex would not come close to meeting the need for parking for participants, parents, and spectators during practices and events. Between Maret and others' use of the site, traffic and parked cars would overtake and overwhelm our neighborhood. This has consequences for safety as well. There are very many young children living in the immediate vicinity, who would be endangered by a great increase in traffic volumes. We were told a traffic study was recently conducted. However, Oregon Avenue, which is normally a major contributor to Nebraska Avenue commuter volumes, has been closed to through traffic for several years for complete reconstruction.
8. **Lighting.** Although Maret has pledged not to install permanent large night lighting, we have not been assured that there will not be temporary lighting. We have been told there will be security lighting, but we question why this would be necessary for a facility that will be gated and locked, and unused at night.
9. **Historic Designation.** The historic main buildings of ECC have recently been recommended for inclusion in the National Register of Historic Places. ECC's application for that recognition did not include the playing fields and wooded grounds. How would the development of these fields as a modern, multi-sport, multi-season artificial turf facility, with the removal of many or most of the existing trees, be compatible with the historic designation of the original design of the buildings and the site/setting?
10. **Proposed Use Change.** The proposed rental of playing fields by Maret to others would be a particular example of change in use. It would introduce non-conforming, commercial revenue-generating activity at odds with residential zoning. The proposed development would require significant re-zoning and exceptions. Any rezoning from current R-1-B residential status would be required to "be in harmony with the general purpose and intent of the zoning regulations and zoning maps and [...] ***not tend to affect adversely the use of neighboring properties.***"
11. **Visual /Physical Impact.** Quality of life in our neighborhood would be seriously compromised by the scale and the constant use of this proposed imposition. Peace of mind, enjoyment of our property, homes, and community are in jeopardy. An acoustical engineer who spoke with us said that noise will never be adequately controlled. The visual impact of removing the wooded nature of the landscape; the cutting and filling a hillside to level it; the installation of acres of artificial turf; intrusive, out-of-scale tall retaining walls to level and secure playing fields, and tall fencing and netting are not appropriate features or qualities for a quiet residential neighborhood.
12. **Alternatives - Shared Facilities.** Maret is clearly comfortable sharing facilities and looking to rent to others to defray expenses. Could this model of use be inverted, with

Maret sharing existing fields with established schools such as Wilson High School, or underused facilities such as the soccer and lacrosse fields of UDC? Both are closer to Maret than the ECC campus, and are on the Metro Red line. Renting from the public school system would help city coffers, and by increasing the use of these sunk-cost assets would be inherently more environmentally friendly than Maret's greenfield proposal. Other schools such as Georgetown Day or St. Albans might also have sports fields to rent.

There are also disused and underused properties such as the parking area surrounding the vacant Lord and Taylor store, the old Lord and Taylor Building itself, which could be served by the underused Geico parking lot just across the Maryland line in Friendship Heights. When one looks at the totality of issues outlined above relative to neighborhood impact, there should be great concern and serious thought given to the use and control of remaining open space in the District.

This is what community is about: sharing precious resources of vegetation, open space and public access with all citizens. This is what makes DC unique.

We look forward to receiving your guidance and support. We would like to discuss this further with you at your earliest convenience.

Kind Regards,

Claudia Russell
5860 Nebraska Ave. NW.

David Patton
6007 28th Street NW.

cc: Ms. Jennifer Steingasser, Deputy Director, Development Review and Historic Preservation
attachments: 6 attachments

Concept Site Plan



Sports Field Summary:

- Land Area: 5.0 Acs. +/-
- Facilities:
 - Multipurpose Field
 - Baseball Field
 - +/- 50 Parking Spaces
 - Field House 4,720 sq +/- (Existing Building 4. for restrooms, locker rooms, equipment storage)

Notes:

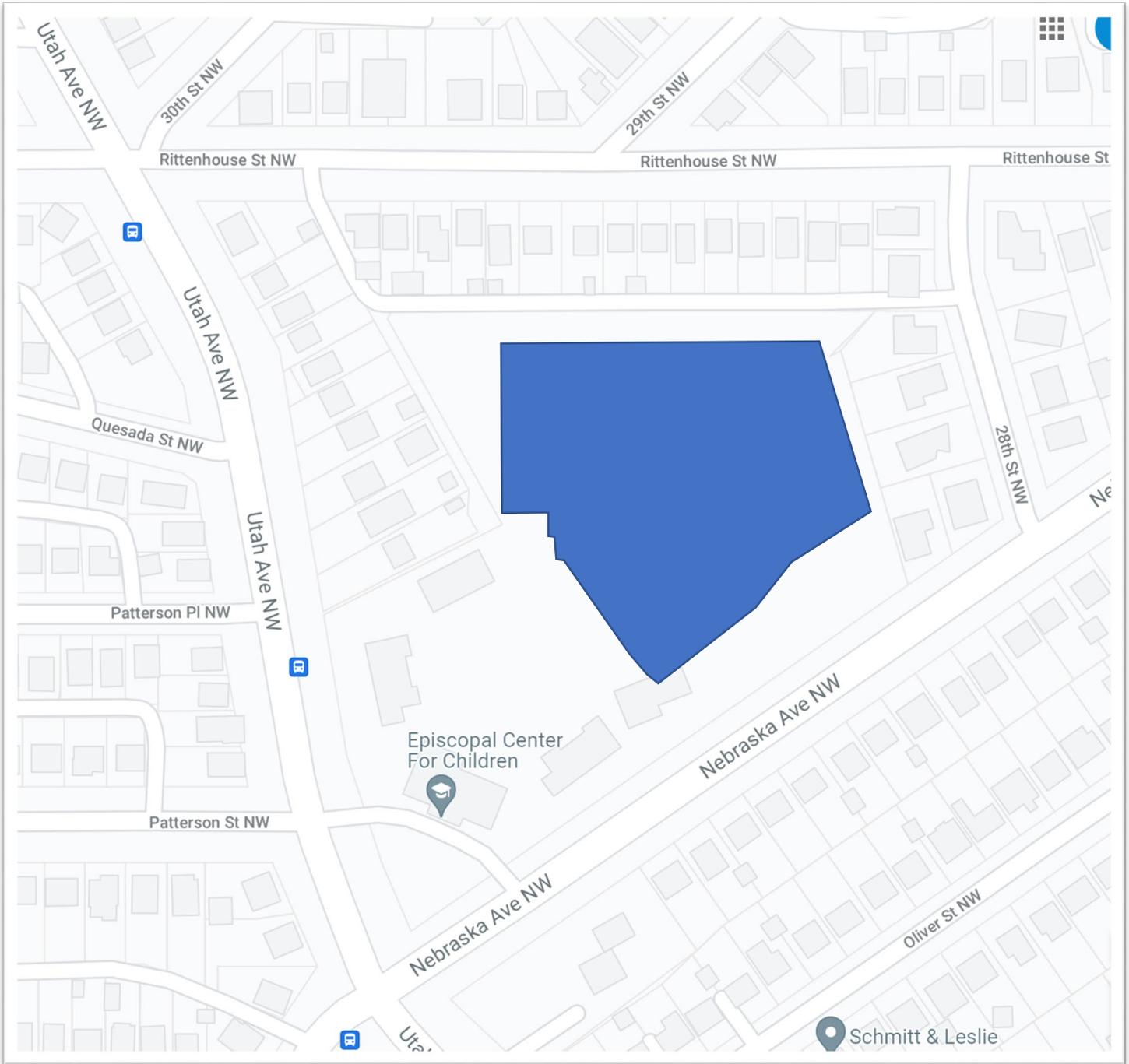
- This Concept Site Plan is prepared for concept presentation purposes only and is not intended for utilization as a construction document.
- All information is subject to change and must be verified with further due diligence (ALTA survey, Heritage tree survey, etc.)



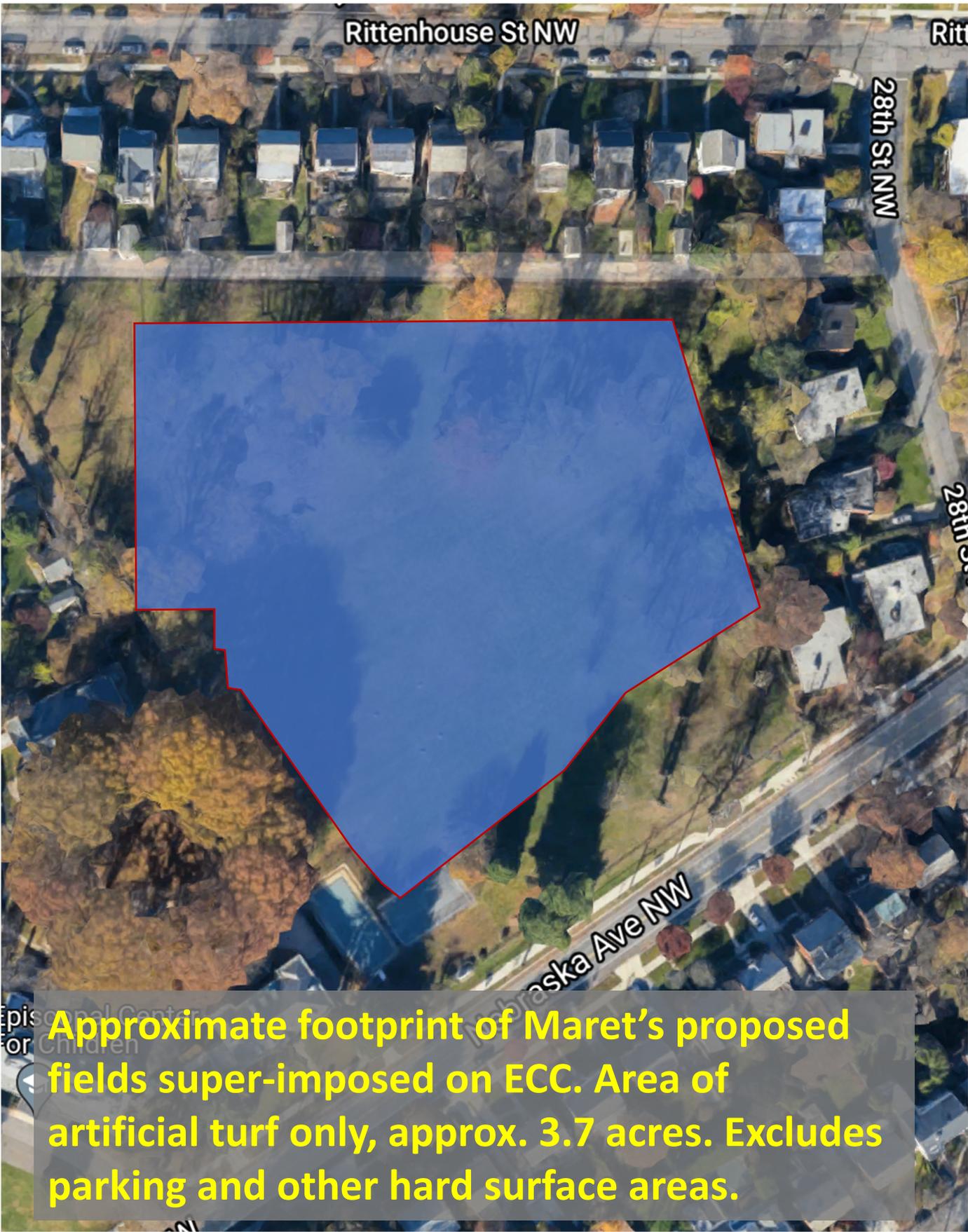
PROPOSED SPORTS FIELDS
 5001 UTAH AVENUE NW, WASHINGTON, DC



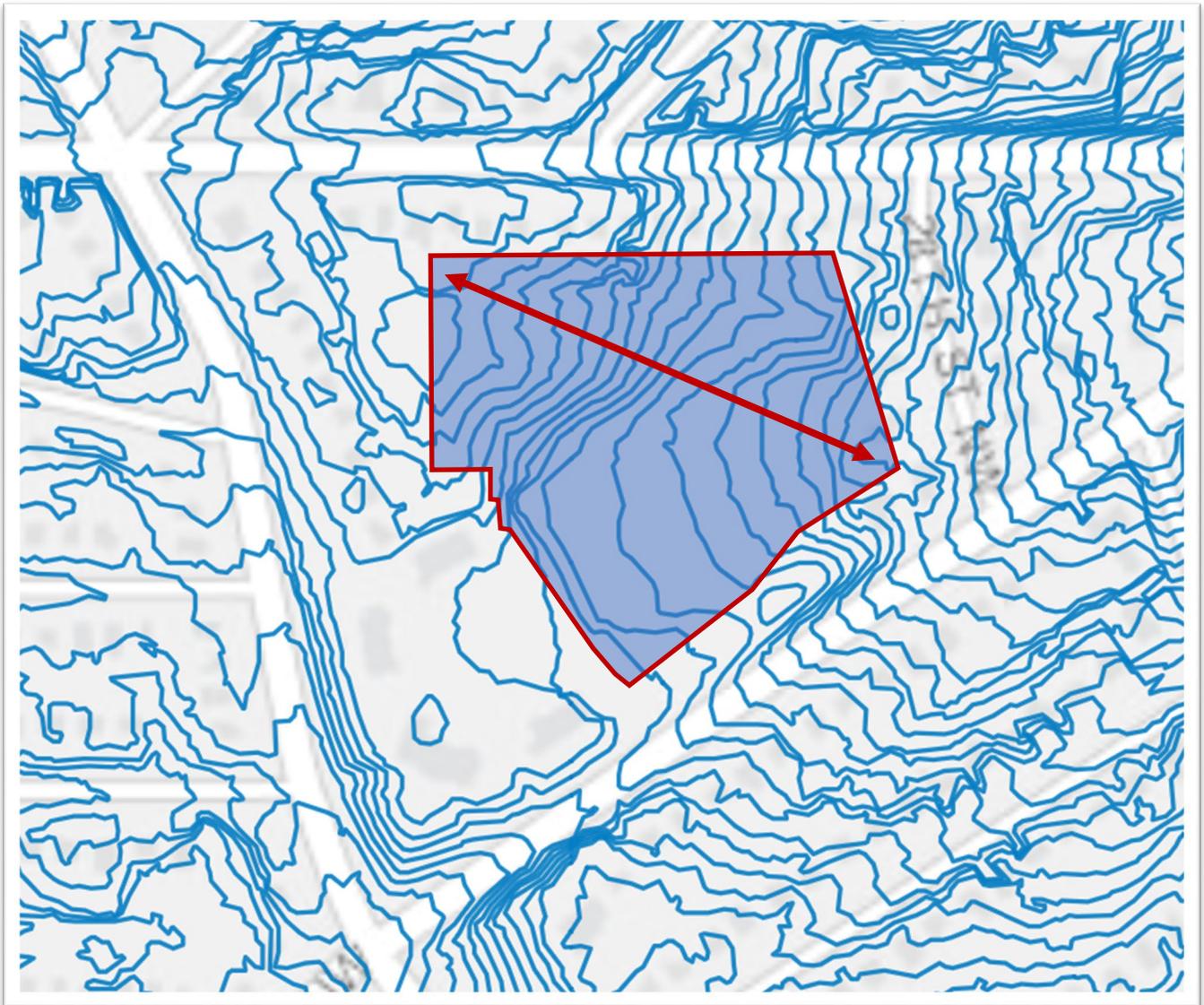
Area of artificial turf in Maret/ECC proposal highlighted.
 Maret presentation, September 2021.



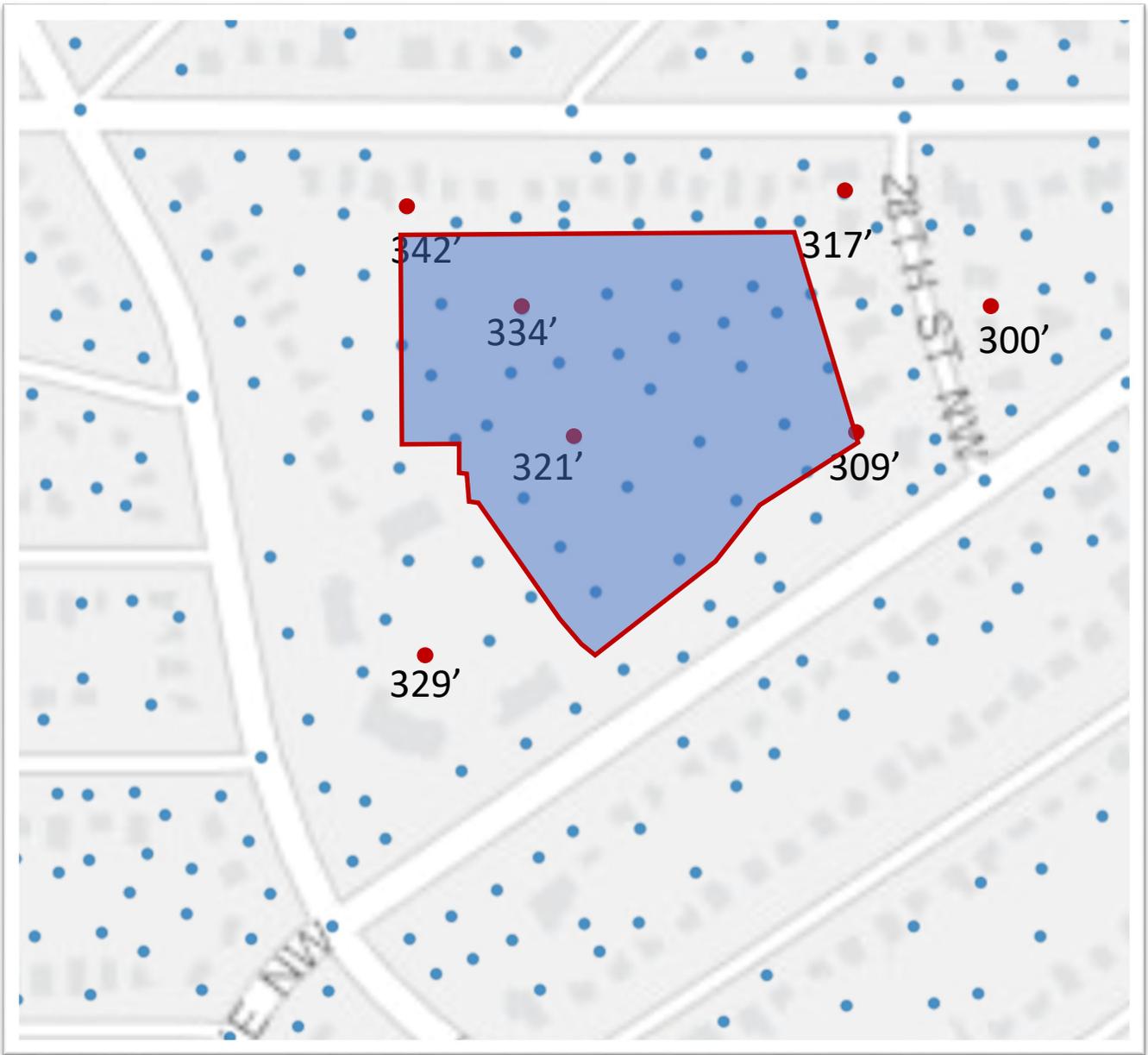
Approximate footprint of Maret’s proposed fields super-imposed on street map. Blue shading represents artificial turf only, approx. 3.7 acres. Excludes parking and other hard surface areas.



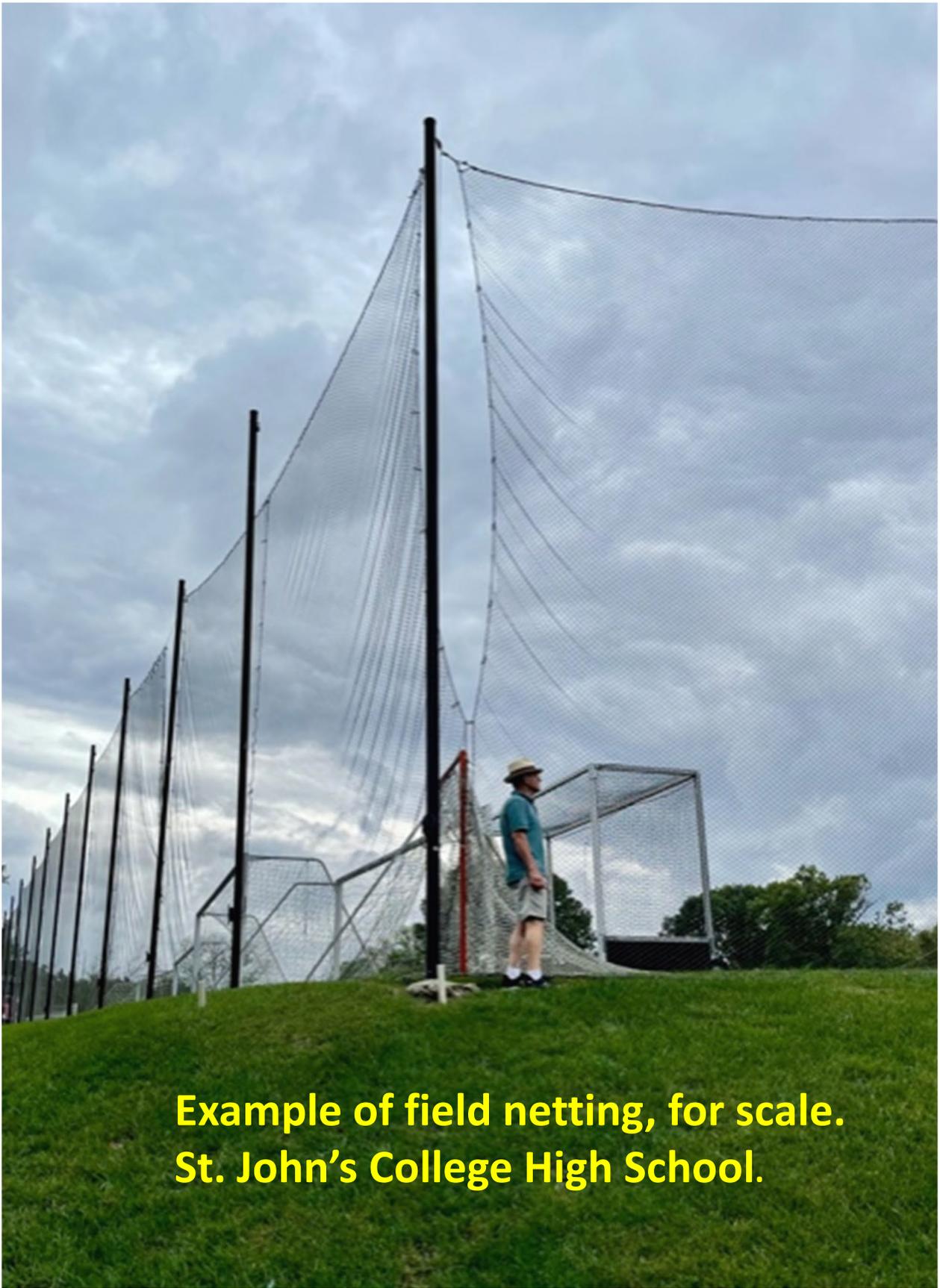
Approximate footprint of Maret's proposed fields super-imposed on ECC. Area of artificial turf only, approx. 3.7 acres. Excludes parking and other hard surface areas.



Approximate footprint of Maret’s proposed fields super-imposed on contour map of ECC. Blue shading represents artificial turf only, approx. 3.7 acres. Excludes parking and other hard surface areas. Contour interval .6-meter, or 2 feet. 32-foot elevation difference from high point to low point,



Approximate footprint of Maret’s proposed fields super-imposed on ECC spot elevations. Blue shading represents artificial turf only, approx. 3.7 acres. Excludes parking and other hard surface areas.



**Example of field netting, for scale.
St. John's College High School.**

November 10, 2021

Mr Aaron Zimmerman, PTP
Site Development Program Manager

Planning and Sustainability Division
Neighborhood Planning Branch
District Department of Transportation
55 M Street, SE, Suite 400
Washington, DC. 20003

Dear Mr. Zimmerman,

We as neighbors have concerns regarding a Maret BZA application for the Episcopal Center for Children located at the corner of Utah and Nebraska Avenues. Their intent is to replace a meadow of grass and trees and natural play area with a sports complex for football, baseball, lacrosse and soccer practice and competition. We understand that the application was sent to you, but we have no filing number with which to track it or respond.

We express the following concerns:

This is a residential neighborhood. The intervention of this sports complex into the neighborhood is unprecedented in scale and its adjacency to residences. Its impact would dramatically alter the neighborhood.

PARKING. The first concern is a 50-car parking area facing Nebraska Avenue in the "front yard" requested as a variance. The BZA application says, "Location of Public Spaces," as the requested variance. Given the proposed earth moving, bio-retention and grade changes, it is not unlikely that they may need to have over-height walls and or fences at the parking area and possibly leading to it from the curb cut. We also bring to your attention the noise and visual impact to the adjacent residences of this proposed parking lot.

OPPORTUNISTIC PARKING. There is limited parking on Nebraska Avenue due to existing driveways, and crosswalks. Maret's plans add to the parking woes with the addition of two full-size bus lay-bys. As you know, drivers will very likely begin parking on side streets when the crush on Nebraska Avenue becomes too onerous. On weekends we could lose much of our on-street parking all together. Does DDOT have methods in place to mitigate parking shortages for residents in situations like these?

ANCILLARY IMPLICATIONS OF PARKING. The curb cut has several ramifications. In their preliminary Transportation Plan, Maret indicates that they will have a zone for two full-size bus lay-bys on Nebraska Avenue located on each side of the curb cut to their parking lot. First, the buses could be parked in the the off-street circular drive on the

grounds of the Episcopal Center for Children as buses have typically done in the past. Secondly, they could also be parked on Utah Ave. where historically buses have parked on the east side of Utah in front of the school. These suggestions would reduce congestion, noise and air pollution on Nebraska Avenue. A related concern is the allowance or non-enforceability of bus idling which always contributes to noise and air pollution. Having recently spent time watching bus transportation at St. John's College High School down the street, I have noticed the school buses being allowed to idle on perfectly lovely days.

SAFETY. With buses straddling each side of the exit from the sports complex, how will drivers have clear visibility and adequate sight lines to see oncoming traffic? This location could be problematic for drivers leaving the sports complex, the neighbors who use and park on Nebraska, and those who use Nebraska as their main commuting artery across town. What is the traffic management plan at the entrance /exit to the sports complex on Nebraska Ave. which is especially complicated by its location at the crest of a hill, and with multiple residential driveways on both the north and south sides of Nebraska Avenue?

TRAFFIC DATA. We are also concerned about traffic, since there could not be realistic counts conducted within the last several years during the continuous construction on Oregon Avenue which was not representative of "normal" conditions. This is above and beyond the abnormalities of travel under pandemic conditions. We know from past experiences how much traffic there is during rush hour on Nebraska Avenue which is precisely the time Maret would be leaving the fields. This does not include the additional parking needs and traffic congestion associated with the operation of the Episcopal Center for Children's scheduled reopening for September 2022. It is not clear how the projected traffic and parking of the Episcopal Center for Children compares with their past use, when staff, arrivals, deliveries, and visitors occupied a great deal of parking space on Nebraska Avenue. Even though Nebraska Avenue is a formal avenue, many young families with children are moving into the neighborhood, and you know and we know traffic congestion and children are not a good mix.

USAGE. The current Maret BZA application projects that the sports fields will be used nearly every day and often by multiple parties except for federal holidays. Our homes are our oases; this much traffic congestion, noise, and parking pressure chips away at our sense of well-being and safety and overall health.

We appreciate your insight into these comments and questions as you review the documentation you received in the Maret BZA submission.

Kind Regards,

Claudia Russell
5860 Nebraska Ave. NW.

November 14, 2021

Mr Aaron Zimmerman, PTP
Site Development Program Manager

Planning and Sustainability Division
Neighborhood Planning Branch
District Department of Transportation
55 M Street, SE, Suite 400
Washington, DC. 20003

RE: Proposed Maret sports complex at the Episcopal Center for Children

Dear Mr. Zimmerman,

On Saturday, November 13, St. John's College High School, on the corner of Utah Avenue, Military Road, and Oregon Avenue, had a football game scheduled to begin at 1 pm. I was returning to my home via Military Road from Takoma Park at 11:45 am. There was already a noted traffic back-up on Military Road and Oregon Avenue. This was only the beginning of much, much more traffic congestion as game time approached.

This does not portend well for the traffic in our neighborhood should the proposed Maret sports complex be approved. Maret is planning full time weekend use. Our streets cannot handle that kind of traffic congestion and our parking is far more limited than the several hundred spaces on St. John's campus. Imagine how many games would be at the same time given the schedules of use at both sites? As residents of our own neighborhood, we would have limited vehicular mobility. Public transportation is not available as neither are near metro stops and the bus service on weekends is extremely limited. This is well beyond what our neighborhood and streets can handle. The burden and stress on our neighborhood by private outside interests seems particularly unfair to the hundreds of neighbors who would be impacted.

This is a residential neighborhood. The intervention of this sports complex into the neighborhood is unprecedented in scale and use. This BZA application requires numerous special exceptions. The very zoning regulations that Maret is seeking to change, exist to safeguard our neighborhoods and our well-being.

We would appreciate that you take this into consideration as you review the documentation you received in the Maret BZA submission.

Kind Regards,

Claudia Russell
5860 Nebraska Ave. NW.

cc: Mr. Randy Speck, 3G03@anc.dc.gov and Mr. John Higgins of ANC, 3G02@anc.dc.gov

December 1, 2021

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

Dear Mr. Lawson,

Re: BZA Application No. 20643 of the Maret School

I write as a representative of over 100 neighbors. We are greatly dismayed by the lack of clearly defined information and graphics, and too many vague suggestions in the BZA application. It makes it impossible for the stakeholders to evaluate the true impact of the proposed sports complex proposed by Maret School (Maret). We ask the Office of Planning to require Maret to provide the following in a timely manner for understanding and examination:

1. The most physically intrusive portions of the proposal are the retaining walls with dense fencing and tall netting atop them. The placement of storage sheds at the field level at the eastern border (28th Street) will be further obstruction. With the leveling of the 35 foot grade drop, the heights would substantially block view and sunlight. Please request Maret demonstrate the exact location and height of these walls and associated elements in relationship to each of the houses that surround the proposed fields. This must be shown in a clear defined way for all stakeholders to be able to understand the impact of Maret's proposal on their homes. A measurable 3-D model is suggested.

2. The greatest overall issue is noise. Without sound control, the sports complex would not meet the requirements of our zoning which is maximum 60 Db. Furthermore, with walls on the west side, an echo chamber would be created amplifying sound. How does Maret plan to mitigate that? Also not shown on the BZA submission are the batting cages on the east side abutting residences. These are on their conceptual rendition and presented at the neighborhood meetings. We ask that the Office of Planning request Maret demonstrate how the sound decibels would be reduced to meet the requirements of 60 Db. employing exact methods and numbers.

3. The greatest environmental impact is the storm water. The calculations do not explain how the water would be handled. What amount of water is being retained/ detained under the field, in the rain gardens and in the retention area and at what grades? What are their mechanics of operation? We ask that the Office of Planning request Maret explain and demonstrate all the systems and grades and show how their proposal would manage water both locally and downstream not only in a 15 year storm but also during projected storms of significant magnitudes such as a 50 year, 100 year, and 200 year storm, all of which have occurred in our city in recent years.

4. The greatest safety concern is traffic. With parking on both sides of Nebraska Ave. and buses straddling each side of the exit from the sports complex, how would drivers exiting the field be guaranteed clear visibility and adequate sight lines to see oncoming traffic? This location could be problematic for drivers (especially young teenage drivers) leaving the sports complex, the neighbors who use and park on Nebraska, and those who use Nebraska as their main commuting artery across town. There are also the pedestrians and bicyclists to consider who use Nebraska as their thoroughfare into the Park. What is the traffic management plan at the entrance /exit to the sports complex on Nebraska Ave. which is especially complicated by its location at the crest of a hill, and with multiple residential driveways on both the North and the South sides of Nebraska Ave? We add that there is discussion that Beach Drive within Rock Creek Park may be closed to commuters which would add additional congestion. We ask that the Office of Planning request Maret provide the traffic plans needed to answer the above and to adequately demonstrate to all the stakeholders that their safety is paramount and that they will be able to access their homes and parking should the proposed sports complex go forward.

We thank you and look forward to receiving the requested information soon so our neighborhood review can be thoughtful and accurate.

Kind Regards,

Claudia Russell
5860 Nebraska Ave. NW.

cc: Ms. Jennifer Steingasser, Deputy Director, Development Review and Historic Preservation

December 3, 2021

Mr. Tommy Wells
Director, Department of Energy & Environment
1200 First Street, NE
Washington, DC 20002

RE: **BZA Case 20643** filed on November 1, 2021

Dear Director Wells,

We represent a group of over 100 neighborhood residents who have serious concerns about **BZA case 20643**, which has been officially referred to your Department for review.

We believe the proposal by Maret School (Maret) to transform approximately 5 acres of undeveloped land into an active sports complex would be environmentally damaging. On land leased from the Episcopal Center for Children (ECC), Maret would permanently alter the site through extensive excavation, regrading, and new construction, to create multi-season, multi-sport artificial turf playing fields. The property is located just west of Rock Creek Park near the intersection of Nebraska and Utah Avenues NW. Single family homes border all sides of the site along Utah and Nebraska Avenues NW, and Rittenhouse and 28th Streets NW.

To our knowledge no other sports fields in NW DC have been wedged into an established residential neighborhood like this.

Introduction:

We suggest that this proposal warrants very careful review. Elements of the project conflict with District policy and could undo recent positive efforts by the City.

DOEE's *Climate Ready DC* plan lays out the city's strategy to make DC more resilient in the face of climate change and to advance the mayor's charge "...to make the District of Columbia the healthiest, greenest, most livable city for all District residents." The stated goals of the *Sustainable DC 2.0* plan include reducing the volume of stormwater runoff, increasing green infrastructure, planting and maintaining trees, incorporating biophilic design, and improving stewardship of nature. The Maret proposal would do none of these things.

The Maret proposal would scrape bare and completely reshape what is currently an undisturbed, grassy wooded site. Natural habitat would be lost, and there would be no natural groundwater recharge. A handful of heritage trees would be selected for attempted transplantation, but several heritage trees along Nebraska Avenue would not be moved, and would instead suffer from deep excavation and permanent alteration of their root zones.

As for undoing positive efforts of the City, DDOT's Oregon Avenue Watershed Project recently completed the conversion of the immediately adjacent alleys to better manage stormwater. DDOT's low-impact development approach installed pervious pavers over a gravel bed

with underdrains to lessen storm runoff. The entire neighborhood is dotted with BMP bio-retention cells. The net positive effect of these efforts would be upended by the quantity of runoff from Maret's acres of artificial turf.

Our request:

- Please help assure that this project receives the scrutiny appropriate to a greenfield development in a residential zoning district. Action by the City to approve the Maret plan would constitute a "major action" as defined by the code of the District of Columbia, Title 8, Chapter 1, Subchapter V, "Environmental Impact Statements". The projected cost of the Maret proposal certainly exceeds the inflation-adjusted \$1 million threshold.
 - o In our reading, DOEE is typically involved in environmental impact screening only after DCRA has been approached for building permits. In this case, with direct, predictable impacts to the watershed, is there any way of flagging the Maret proposal for special, integrated assessment at the stage of BZA review?
- Please look for opportunities to advocate for forward-thinking, environment-conserving construction practices, even when current District regulations fall short of this goal.
 - o For example, stormwater runoff at this proposed development would increase tremendously from regrading and the installation of artificial turf. Yet municipal regulations only address contaminants in runoff, not the volume of runoff.
- Similarly, please help advocate for the application of zoning regulations and review procedures that are appropriate to the scale of this project.
 - o For example, the standard 200-foot notice rule for zoning actions does not scale with the size of the project. The same rule applies to both a single-family home addition, or to a proposal like this one, to transform 5 acres and permanently alter an entire neighborhood. Maret did what was required, but it is not enough.
- Can you clarify DOEE's role in guarding DC's urban forest and valuable open space, given the important link between trees, groundwater, climate change, and sustainability? While DDOT "oversees the District's tree policy", DOEE co-chairs the Urban Forestry Advisory Council.
- Would you be willing to meet with us to explore our concerns in more detail?

Sincerely,

David Patton
6007 28th Street, NW
Washington, DC 20015
dpatton@hayfoot.net
202-460-9470

Jill MacNeice
5723 Nebraska Ave, NW
Washington, DC 20015
jmacneice@gmail.com

Background:

The Maret development, if allowed to go forward, would create significant negative impacts. Comments below are in line with the Office of Planning's *Sustainable DC 2.0* Initiative.

- 1. Removal of Natural Vegetation.** This parcel of land is currently carpeted with grasses and woody vegetation including special and heritage trees. The Maret plan would remove trees, dramatically reshape the site, and relocate only four healthy heritage trees. In place of natural soil, grasses, and woody vegetation, Maret would install approximately 3.7 acres of artificial turf with gravel-lined underdrains, and additional hardscape areas for parking and circulation. There would be some perimeter (not yet specified) natural vegetation. A significant heat island effect would result from the combination of artificial turf, hardscape elements, and loss of cooling from plant materials. *Bethesda* magazine, in the article *Turf War* (11-18-2019) claims that outdoor air temperatures in the upper 80s generate artificial turf temperatures approaching 140 degrees. Hardscape for parking would add additional heat stress.
- 2. Extensive Excavation and Regrading.** The proposed site is sloping ground, with an elevation difference of approximately 35 feet from west to east. To flatten the nearly 5-acre site to accommodate the sports complex would require extensive cut and fill excavation. To accommodate the extensive fields, tall retaining walls would be required at or near the property line, very close to neighboring houses. The plan also calls for tall fencing and perimeter netting, the details of which have not been disclosed.
- 3. Stormwater Management.** We are deeply concerned about water runoff volumes and water quality issues likely to result from the conversion of this large, undisturbed, natural field. Stripped of trees, with topsoil replaced by a packed substrate and gravel drainage, and grass replaced with artificial turf, the site would be a funnel, not a field. Reducing natural groundwater recharge would tax the already over-loaded stormwater system. During heavy rain events, Nebraska Avenue becomes a torrent streaming toward Rock Creek Park, suggesting the underground storm drains are already at capacity. Recent remedial work in the immediate vicinity has included bio-retention cells (BMPs) and complete reconstruction of adjacent alleys with permeable pavers and underdrains. These have been functioning well to detain and retain stormwater under current conditions. We are concerned about runoff affecting not only immediate neighbors, but also Rock Creek, the Potomac, and ultimately, the Chesapeake Bay.

Maret has proposed a "rain garden" ringing the proposed parking area, and an early concept showed a large "bio-retention" feature in the southeast corner of the site, twice the size of a nearby house. The details of how exactly these stormwater management features would work has not been disclosed. Would there be retention and/or detention structures, and/or sand filters? Maret should provide detailed answers to major questions about capacity and effectiveness, and address health and safety concerns about particulates, pollutants, seepage, mosquitoes, and other pests by providing facts.

4. **Habitat Loss.** This site is very close to Rock Creek Park, and a haven for birds and other animals. Resident and visiting hawks and owls, numerous other bird species, foxes, raccoons, opossums, and deer to name a few, are all found here. Maret's intent to fence the perimeter and install tall netting runs contrary to the preservation of habitat and the stewardship of natural resources.

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