

VIA EMAIL

Board of Zoning Adjustment – dcoz@dc.gov
Advisory Neighborhood Commission – 3-4G
Randy Speck, Chair - Randy.Speck@anc.dc.gov
John Higgins - 3G02@anc.dc.gov

Re: Board of Zoning Adjustment Case #20643: Maret School

January 21, 2022,

Dear Board Members and ANC Commissioners,

I am writing to express my opposition to the above-referenced Application of the Maret School (Applicant) for special exceptions at the Episcopal Center for Children (ECC). I am a member of Friends of the Field, a Party to this case.

My property is contiguous to the ECC playing field. I do not oppose living directly next to a playing field for children. I have resided next to ECC, a school for children facing severe emotional challenges, for over 20 years while ECC was open and ECC students played on the school's field. I personally supported, in writing, ECC's expansion when they built their Media Center.

I oppose the Application for these reasons:

Over-development. The Application seeks too much lot coverage and activity on too small a site without significant setbacks from residences and few to no visual or sound buffers. There is no justification for the construction of two regulation sized fields, apart from the convenience of the Applicant's students and parents and the financial benefit that the Applicant expects from the expansion of its athletics programs and from lucrative subleasing.

Supporters of the Application have expressed a preference not to drive outside of Northwest DC for their childrens' sporting events. This concern, though understandable, is not a zoning consideration. The Application places parental driving convenience before the residents of the neighborhood, ANC 3/4G, and in particular on those living within 200 feet of the ECC site.

Another justification presented by the Applicant is the desire to consolidate as many sports as possible in a single location. While this may be a convenience to the school's parents and financial benefit to the Applicant, the proposal is to solve this "problem" at the expense of the community, which will pay with their property values and peace and quiet.

There is simply no compelling justification for jamming two regulation size fields, one for football, soccer and lacrosse, and a second for baseball, into the ECC site, which is too small to accommodate them. If the Applicant were to construct just one regulation size field on the ECC site, nine (9) upper school teams would benefit: (1) girls' soccer - varsity, (2) girls' soccer – junior varsity, (3) boys' soccer - varsity, (4) boys' soccer – JV, (5) girls' lacrosse - varsity, (6) girls' lacrosse – JV, (7) boys' lacrosse – varsity, (8) boys' football - varsity, and (9) boys'

football – JV. Isn't that enough? The parents and the Applicant's athletics program would also benefit hugely.

Buffers. The proposed development has minimal to no buffers and would require construction of a tall hill behind 28th Street, including at least 12 feet of terraced retaining walls to support the fill on the East end of the ECC field. Tall fencing with significant netting (18'-25', which the Application describes as "unobtrusive) is proposed at the top of the 12 foot hill of retaining walls. The Application says that siting, screening and layouts have been "*studied in order to accommodate the significant grade change on the Property and to minimize any potential impacts on the adjacent properties.*" In reality, the proposed development would completely separate the East side of the site, which has contiguous homes on 28th Street and Nebraska Avenue, from light and view, dwarfing the scale of these contiguous homes and *maximizing* the negative impact on these properties. The Applicant's rendering of the proposed project on its public website simply airbrushes these contiguous houses from the picture and replaces them with trees (which will actually be removed from the ECC site). The contiguous houses would be the buffer between the proposed fields and other portions of the neighborhood.

Intensity of Use. The Applicant proposes to rent the proposed fields nearly every day of the year¹ to outside sports leagues. Such leagues would be using the proposed fields more than the Applicant would. Although several sports leagues based outside of ANC 3-4G favor the proposed development based on their desire for field space for their use, their wishes must not be permitted to supplant the legitimate considerations of the neighbors who live in the ANC. Noise would be a constant concern given the Application's proposed level of use of the fields. The maximum allowable sound level in this zoning district is 60 dB, and sports activities of the proposed intensity would exceed that limit significantly.

The neighbors have made such concerns clear to the Applicant, and the Applicant has made clear to the neighbors and the ANC that **they do not need the rental money**. There is simply no basis for approving the proposed intensive and constant use. The Applicant characterizes Applicant's proposed rental business as "a significant community benefit," and this is misleading. The true purpose of the proposed rentals is not to benefit the community, but to reduce maintenance costs for the Applicant and their school community – a very limited and private benefit. The Applicant's extensive rental business would shift the maintenance cost for the proposed sports fields off of the Applicant and onto the community, and specifically the contiguous and bordering neighbors, who would pay with their peace and quiet on weekends and with their property values.

A more city-friendly and ANC-friendly plan would be no rentals and for the Applicant to pay to maintain any field, of which the Applicant's students would be the beneficiaries. With no rentals at all, the Applicant could still make lease payments to ECC, to enable ECC to re-open for 10-25 children that ECC projects. The proposed re-opening of ECC would be a public good that all neighbors support. Applicant's proposed rental business would not.

¹ The scale of the proposed rental business has been a moving target, with the Applicant pledging on 12/15/2021 that they would reduce that proposed use by subtenants, based on neighbors' feedback, to the Applicant indicating during a January 6 call hosted by Janeese Lewis George that they are considering *increasing* the proposed rentals, based on feedback from non-ANC 3-4G residents.

Environmental and Flooding. The proposed development is contrary to the clear environmental goals established in the Sustainable DC Plan. The removal of forty well-established trees and topsoil, which would be replaced with 3.7 acres of artificial turf, with additional hardscape for parking and sidewalks, is contrary to every goal of the Plan.

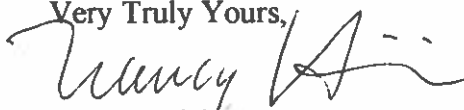
The water runoff is a serious consideration. The city recently re-constructed the closest alleys for water retention and built rain gardens on 28th Street due to the significant water heading downhill to nearby Rock Creek. The Applicant is well aware of, but has not addressed, the fact of 50, 100 and 200 storms in recent years. The Sustainable DC Plan recognizes that “the intensity and frequency of [] severe rain storms is only expected to increase in the District as a result of global climate change.”²

Traffic and Safety. The Applicant and its proposed tenants’ use of the site would likely overwhelm our neighborhood streets with traffic and parked cars nearly every day. Game days would bring congestion and noise akin to that from St. John’s College High School less than a half mile away. Their games create noise far into the neighborhood despite the significant buffers of Rock Creek Park, Military Road and the school’s buildings. The proposed development includes no similar buffers.

The proposed development would create a traffic safety problem for neighborhood children and families who use our streets as well as Nebraska Avenue to enter Rock Creek Park. Pick-up and drop-off for the practices and competitions and third party rentals would occur at the same time as heavy commuter traffic, and ECC’s school operations once ECC reopens.

For each of these reasons, I oppose the referenced Application.

Very Truly Yours,



Nancy Voisin
6004 28th Street, NW
Washington, DC 20015

Cc: Janeese Lewis George – jlewisgeorge@dccouncil.us
Friends of the Field – friendsofthefield20015@gmail.com

² The Climate Ready Plan provides the following examples: In July, 2019, the District experienced a month’s worth of rain in a matter of hours stranding residents on top of their cars. In 2016, another cloudburst over Cleveland Park sent water rushing down the Metro station escalators and submerged the tracks with water, closing the station. In 2012, heavy rains over the Bloomingdale neighborhood overwhelmed the storm sewer system and flooded streets and the basements of homes. In 2006, heavy rains (or cloudbursts), over Federal Triangle caused flooding that submerged the basements of federal office buildings and national museums with multiple feet of water, *causing millions of dollars in damage* and exposing the priceless collections of the country’s museums. (Emphasis added).