To: ANC 3/4G Commissioners
From: Friends of the Field Steering Committee

FRIENDS OF THE FIELD
RESPONSE TO PROPOSED ANC 3/4G RESOLUTION

Simply stated, the Friends of the Field opposes many parts of the February 21 draft Resolution submitted by Chairman Speck and Commissioner Higgins. As the ANC prepares to vote on the draft Resolution, we feel that it is important that each ANC 3/4G Commissioner understands both our position on the issues and the rationale for those positions.

We participated in an ANC Advisory Committee to negotiate a settlement between the affected parties in relation to Maret's effort to build a sports complex on the ECC property. We submitted a document which represents the views of the 250 neighborhood partners of the Friends of the Field. The draft Resolution presented to you by Chairman Speck is not the result of a mediation between the parties.[1]

We want the Commission to fully understand the substance and rationale for the Friends of the Field Proposed Agreement, which is attached as Exhibit 1. Highlighted portions of Exhibit 1 are Friends of the Field proposals incorporated in whole or in part into the draft Resolution. Today, we emphasize the impassed significant issues which we are forced to present to the Commission and then to the Board of Zoning Adjustment.

The Maret Proposal Does Is Inappropriate for the Community. We used Google Earth to locate and identify all of the athletic fields in the District of Columbia. [Exhibit 2]. Although not perfect, this approach was considered the most comprehensive. Among other characteristics the perimeters of each field were examined. In the vast majority of cases, the athletic fields in D.C. are situated within a larger campus, either of a school or park, and the remaining boundaries of the fields are city streets. Of the 217 fields identified, our study found 33 fields in the District where even one residence was closer to an athletic field than across a street. In most of these cases, only a few residential buildings are in any proximity. As is evidenced by the screenshots from Google Earth, taken to illustrate the relationship between fields and residences, NONE of these existing fields look like the Maret proposal.

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[1]In paragraph 11 of the Background Facts, the report states that the Advisory Committee had reached impasse with Maret "on several significant issues." That conclusion may be technically correct. But that is only because Chairman Speck and Commissioner Higgins abandoned their role as mediators. In true mediation, the mediator transmits proposals and tries to nudge the parties together. Here, Chairman Speck distributed his proposal on February 6 and requested comments. Maret apparently submitted comments, but not to the members of the Advisory Committee. Friends of the Field submitted its response to the entire Advisory Committee and to the Maret representatives who received the February 6 draft from Chairman Speck. In the transmittal email, we requested a copy of Maret's response. Neither Maret nor Chairman Speck forwarded a copy of the Maret statement to the people on the Advisory Committee. While the parties may be at impasse, the impasse was not the result of good faith bargaining, let alone any bargaining.

There is no comparable site where a field is wedged into such a heavily residential neighborhood. Except where the residences were constructed AFTER the field, there is no comparable intensity of use of the site, with edges of the fields so close to residences. In the majority of examples significant setbacks and buffers exist to mask the athletic facility from residences.

For all but a few of these fields, the site is relatively flat. There is NO comparable grade change in any of the existing settings, necessitating the substantial cut and fill required by the Maret proposal for the ECC site. The grade change on the ECC field is THIRTY FIVE FEET. TWELVE FEET of retaining wall, beginning FOUR FEET from one property line, are required by Maret's proposal.

In the entire District of Columbia there is NO comparable use of netting proximate to residences. The vast majority of the existing athletic fields are sufficiently sited to require NO NETTING at all. The netting in the Maret Proposal is 30' – taller than many of the abutting homes.

Of the 33 fields proximate to a residence, 24 are public. It is reasonable to ask citizens to accommodate a field which benefits the public. The proposed field is for private or commercial use. Any public access is solely at the discretion of a private entity. BZA Orders have been used to severely limit or entirely prohibit sub-leasing of such private fields, in order to protect the rights of neighbors.

As a "selling point" of their proposal, Maret has represented that their development will improve the equitable access to playing fields. Leaving aside the question of who Maret intends to lease their fields to, and whether they constitute a "disadvantaged" population, the ECC site is over 3 miles from the Maret campus. If Maret is serious about equity, they should seek to locate their new fields where they are truly needed. Wards 3 & 4 currently hold 26.6% of the population under the age of 18 and 36.4% of the fields. Wards 6, 7 & 8 hold 48.8% of the population under 18 and 29.9% of the fields. (population numbers from U.S. Census Bureau).

Intensity of Use. The ECC property leased by Maret School is currently a field. There is no objection to its continued use as a field, and we agree that it is currently underutilized. The question is how to develop the ECC field's use for athletics while at the same time respecting its location within a residential community.

Two aspects of any proposed development have a profound effect on the successful integration of enhanced athletic fields into this residential community: intensity of size and intensity of use. The consideration of intensity of size is considered elsewhere.

In its BZA filing Maret submitted graphs and charts of projected use of the fields. These materials are fundamentally misleading. Maret's figures for the percentages of times the fields will be in use have been very significantly watered down by including as potential times of usage 8 a.m. to 8 p.m. every day. The majority of daylight hours throughout the academic year are hours when school is in session. In any school, the hours of recess are a very small portion of total school hours.

Even IF the 20-25 projected ECC students should choose to play on the gated athletic fields rather than on playground equipment on ECC grounds during their recess, the inclusion of the entire school day as hours available for use is disingenuous at best. It is more accurate to assume school hour usage would average one hour per day. Maret's "available hours" also should not include a 12 hour day 365 days per year. In the winter months, it is dark well before 8 p.m. If we adjust Maret's number accordingly to these considerations we get a very different picture of how many of the available hours the field will be in use under Maret's plan:

Maret's practices and games: 21.64%
Maret summer camp: 12.27%
EITHER Maret or rental: 6.77%
Rental: 14.42%
Gray(purported alterations): 19.81%
Fields Open: 24.5%

The bottom line: during daylight hours, **Maret intends to have the fields in use 55.1% of all available usable hours**. That is simply TOO INTENSIVE for the Field's location in such close proximity, without adequate setbacks and buffers, to a settled residential neighborhood.

In the few rare occurrences where an athletic field has been added to an existing residential neighborhood, BZA orders have limited, or entirely prohibited, sub-leasing, in order to minimize the intensity of use. Considering Maret's own intense projected use of these fields for their own program, ANY additional use through sub-leasing should be prohibited.

One Field. We proposed that Maret construct only the multi-purpose field for several reasons. As shown on Exhibit 1 at page 13, one field allows a design allowing greater setbacks or buffers between the perimeter of the athletic field and the perimeter of the property. One field allows moving the parking lot so it is not immediately visible from Nebraska Avenue or by the neighbors on Nebraska Avenue. One field allows the placement of bleachers in locations which minimize both player and spectator noise. And one field minimizes the amount of artificial turf "needed" by Maret.

Artificial Turf. Friends of the Field Town Hall on February 17, featuring presentations by experts on the problems and dangers of plastic turf.[2] They confirmed our requirement for natural

[2]Experts who spoke at the town hall included:

- Diana Conway, JD and president of SHPFI, a Montgomery County based non-profit dedicated to educating communities about the dangers of plastic turf.
- Dr. Kyla Bennett, PhD and JD, New England PEER's Director and PEER Director of Science Policy, who previously worked at EPA.
- Robert Goo, environmental protection specialist at EPA.

grass and underscored the reasons why natural grass is the must-have option for both the users of the field and the neighbors. There are six categories of danger associated with plastic turf:

Injury. Although we proposed that artificial turf could be used only on the multi-purpose field, the rejection of our compromise allows us to oppose any artificial turf on the Field. In the opening moments of Super Bowl 2022, Odell Beckham Jr., Rams wide receiver, was sidelined due to a non-contact knee injury. CBS News reported: "Odell Beckham Jr.'s injury causes NFL stars to advocate for banning turf field in stadiums." In the U.S. Women's National Soccer Team's Title VII litigation, the women claimed that men played on grass but they were forced to play on turf.

It is well documented by scientific studies that plastic turf causes increased injury to players of all ages. Studies show athletes are 58% more likely to sustain an injury on artificial turf. Football, soccer and rugby athletes were at a significantly greater injury risk. Upper and lower extremity and torso injuries also occurred with higher incidence on artificial turf, according to a study of high school athletes published in 2021 in the JOURNAL OF CURRENT ORTHOPAEDIC PRACTICE. Plus turf burn and severe injuries to skin are also a danger, as outlined in "Turf War," an article in BETHESDA MAGAZINE in 2019.

Heat, There is no doubt that plastic turf fields are hotter than natural grass. Even the manufacturers acknowledge this is a problem. That is why they tout the newer, natural infills as cooler than the infills made of crumb rubber. But just because manufacturers claim their product is cooler than crumb rubber does not mean the plastic turf fields with natural infills cannot get dangerously hot. According to the Penn State Center for Sports Surface Research, plastic turf is hotter than natural grass because of the plastic fibers. Natural grass is cooler because grass leaves transpire — they release water vapor, and evaporation causes cooling. On hot days, natural grass is cooler than the ambient temperature. Even without infill, research shows that the heat from plastic fibers can reach 125-150 degrees. Plastic turf is consistently hotter than the air temperatures and hotter than natural grass, regardless of the type of infill.

The District of Columbia has recognized that [Exhibit 3 at 11]:

> Neighborhoods with large areas of pavement and buildings, and minimal green space, will be more negatively impacted by extreme heat. We will identify and target these areas for expanding green spaces, tree planting, cool roofs and pavements. We will also evaluate our existing heat emergency plans and cooling centers to ensure they meet the needs of the most vulnerable residents, workers, and visitors.

Toxicity. Substances and chemicals that cause cancers and lung disease, disrupt the endocrine system and create other health problems to humans, animals, and plants, are known to be present in plastic turf. Replacing crumb rubber with natural-based infills does NOT solve this problem.

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[2](...continued)

Synthetic turf is a rug made from plastic. Plastic is made from hydrocarbons. Hydrocarbons are volatile compounds which evaporate quickly, known as off-gassing, in the presence of sunlight and heat. To obtain the look and feel of grass, the plastic grass blades must be softened with dangerous plasticizers. Additionally, they must be stabilized to prevent photo-degradation from the sun and made non-flammable by the addition of flame retardants. Finally, Lead is added to fix the color in the plastic.

The Toxic Use Reduction Institute (TURI) at U Mass Lowell, found evidence of PFAS (Per- and Poly-fluoroalkyl Substances)— "toxic forever" chemicals that cause cancer, in artificial turf carpet. PFAS is used as an extrusion aid during the manufacturing process. Health effects documented for PFAS include deleterious effects on the endocrine system, including liver and thyroid, as well as harmful metabolic effects, developmental effects, neurotoxicity, and immunotoxicity. PFAS are also persistent for hundreds of years, bioaccumulating in plants, animals and humans, and contaminating drinking water.

As our experts pointed out, PFAS exposure is not only a problem for the children who will be playing on the field (*See* the *Washington Post* article: "Does Playing on Artificial Turf Pose a Health Risk for Your Child?") but also for the residents in the many homes surrounding the field. PFAS and other toxic chemicals from the plastic carpet seep into the air, soil and water of backyards and gardens of the surrounding homes.

Can't be recycled. Plastic turf lasts only 8-10 years. At that point, the carpet is so degraded from use, sunlight, and exposure to the weather that it is no longer safe and must be replaced. The average playing field has 40,000 lbs of plastic turf. It cannot be recycled. It piles up in landfills and illegal dumps: tons of plastic carpet laced with toxic compounds breaking down at the micro level and polluting the soil and watersheds for centuries. There are more than 13,000 plastic turf fields in the country, as much as 330 million pounds of waste every year, according to the the Synthetic Turf Council. This is a waste problem of global proportions, one that grows exponentially with each new field installation.

In January 2022, SB 321, a bill to require a chain of custody for discarded plastic turf, was introduced in the Maryland legislature. Two Maret students, from the very school that is pushing for installing plastic turf at the ECC field, worked on that bill.

Expense. Critics of natural grass fields claim that it is too expensive. In fact, the opposite is the case. Even a carefully maintained natural grass field is significantly less expensive than plastic turf — 30% less.

Safe Healthy Playing Fields (SHPFI) estimates the lifecycle cost for newly installed top quality grass and turf:

For Grass	For Synturf
Base cost: $400k. + Generous $50k/year for maintenance X 20 years. + Generous allocation for occasional resodding for exceptional damage--$250k over 20 years. **Total 20-year estimated cost**, with a top-quality grass field ready for use in year 21: **$1.65M**.	**Base cost: $1.2M (up to $1.6M).** + Shock-pad to mitigate Gmax-- $100k (up to $175k). + Modest $10k/year for maintenance X 20 years-- $200k. + Replacement cost at (generously) year 10 (could be year 7 –or year 3)-- $400k (up to $850k). + 2nd replacement cost at year 20--$450k. + Disposal of the original field at year 10-- $0 (if illegally) to $150k. + Disposal of 2nd field at year 20-- $0 to 150k. **Total 20-year estimated cost**, with a top-quality synturf field ready for use in year 21: **$2.35M**.

Stormwater Control**.** Maret has yielded to pressure and agreed to protect against a 25-year storm. But the District of Columbia has already concluded that this will be inadequate especially for a potential 50-year lease period:

> What is expected to change significantly is the frequency and intensity of heavy precipitation events, from rain to snow, that can cause flooding and pollution from stormwater runoff. As shown in the chart, today's one in 100-year precipitation event could become a one in 25-year event by mid-century, and a one in 15-year event by the 2080's.

[Exhibit 3 at 3]. Forward thinking and environmentally sensitive design is a critical bulwark to climate change. What is the design to minimize storm water run off particularly with Rock Creek nearby to receive the runoff, and then directing it to the Chesapeake Bay? What is the design to be good stewards of our environment knowing that this field is linked to the greater landscape of D.C.? The problem is exacerbated if, in addition to water, run-off from the Field includes carcinogens from the artificial turf.

Plastic turf installation removes water absorbing topsoil down to the clay, packs it even further with heavy earthmoving equipment, and creates a dead zone beneath it so no air or nutrients can penetrate. This kills any insects or animals living in the soil. Stormwater no longer percolates into the ground. Instead it is captured in pipes below the plastic turf and directed into sewage pipes. Stormwater runoff is not benign. Environmentalists now claim that stormwater runoff is the #1 pollution problem in the nation.

No Leasing and Community Use. We proposed that the athletic Field be used primarily by Maret to support its athletic programs and that Maret not lease the Field to youth sports groups or to any entity associated with Maret which does not exist exclusively for the benefit of Maret students and for which Maret charges students for participation. Our goal was two-fold. We do not want the Field to become the basis for a business. Maret has said that it does not need the rental income. Eliminating leased use will greatly increase the time available for community use (use by ECC, the District of Columbia Public Schools, and the Community).

Noise Control. The Maret Plan does not allow sufficient vegetation to mitigate noise. There is not the space to create the density of vegetation to mitigate sound. Maret is requesting a zoning exception for these fields. Any exception requires that the exception should do no harm. Crowds and sports teams often are over 90 decibels. A single whistle blow ranges from 104 to 116 decibels. This is a nuisance and an annoyance issue which is part of the harm caused by this proposed project.

Traffic Management. Friends of the Field finds it necessary to object to the quality, substance, timetable, and conclusions of the Wells/Maret Study on both general and specific grounds. It is significantly flawed in scope, treats a too-limited study area, makes only a weak and narrow assessment of existing conditions, and applies ill-founded assumptions about the projected use of the proposed facilities. The likely effects of the proposed development on this densely settled, uniformly residential neighborhood of single-family homes and mostly low-volume, low-speed local streets are interpreted far too narrowly. The Wells/Maret study does not focus on afternoon commuting times, the only period the parking lot will be in serious use. It does not factor the reopening of Oregon Avenue and the projected closing of Beach Drive. See Exhibit 5 for additional detail.

Parking Lot Location and Trees. If the proposed parking lot were to be shifted north, as it could be without loss to a one-field plan, it would be beneficial to the established trees. This move would save two heritage pine trees (designated #340 and #341 on Exhibit 4) which are true gems at the site. At a Special ANC 3/4G meeting on February 16 in which Earl Eutsler of Urban Forestry spoke, Commissioner Michael Zeldin commented on these remarkable trees. Preserving these established trees would provide excellent screening, which would be sorely needed to block the proposed tall backstop and netting of the proposed Maret field. Preserving them would lessen visual intrusion both from the street and relative to nearby residences. Shifting the parking lot north would also serve to better protect heritage trees #348 and #323. Heritage trees #348 and #323 were both seriously distressed when the grade of Nebraska Avenue was lowered more than ten years ago. [Exhibit 5]. The critical root zones of both heritage trees #323 and #348 extend far under the limits of the proposed parking lot and (in the case of #348) the proposed rain garden. Construction activities of excavation, compaction, and paving would unavoidably further distress these trees.

Moving the parking lot would obviate the necessity for an exemption to allow the parking lot to be on the "front lawn" of the Field.

Construction. The ANC's proposed Resolution permits construction vehicles to enter the site no earlier than 8:00 a.m. Monday through Saturday. The proposal allows "off-site staging areas" so that trucks can enter the neighborhood to park before 8:00 a.m. But the proposal allows actual construction to begin at 7:00 a.m. Monday to Friday and at 8:00 a.m. on Saturday. We believe that construction noise starting at 7:00 a.m. is inappropriate in a residential neighborhood. We further believe that allowing trucks to enter the site an hour after the start of construction work will lead to inevitable violations of the 8:00 a.m. vehicle entrance requirement. Both times should be at 8:00 a.m. And there should be no Saturday construction. We oppose off-site staging in the neighborhood.