

Government of the District of Columbia
ADVISORY NEIGHBORHOOD COMMISSION 3-D
P.O. Box 40486
Palisades Station
Washington, D.C. 20016

**TESTIMONY
OF
THOMAS M. SMITH
CHAIR, ADVISORY NEIGHBORHOOD
COMMISSION (ANC) 3D
BEFORE THE
DC ZONING COMMISSION**

Re: Z.C. Case No. 11-07

**(American University – Campus Plan
And Further Processing)**

September 22, 2011

**ZONING COMMISSION
District of Columbia**
CASE NO. 11-07
Board of Zoning Adjustment
District of Columbia
EXHIBIT NO. 11-07
CASE NO. 16857
EXHIBIT NO.18B

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EXECUTIVE SUMMARY

Introduction: In assessing whether AU's proposals are both reasonable and appropriate, ANC 3D finds that AU has failed to meet its burden of proof to show why the 2011 Campus Plan will not have adverse impacts on the surrounding neighborhoods. Elements of the 2011 Campus Plan are inconsistent with the provisions of Subsection 210 and fail to meet provisions of the Comprehensive Plan intended to protect residential neighborhoods. ANC 3D recommends the Zoning Commission send objectionable elements of the plan back to AU and instruct the university, ANC, and residents to enter into meaningful discussions and address all parties' concerns with a goal of compromise and consensus.

ANC 3D Review: ANC 3D's review has been comprehensive, reasonable, and fair and the product of significant input from residents and AU.

Population Cap: AU has proposed a 13,600 student and 2,900 staff cap. ANC 3D believes the 13,600 student and 2,900 staff cap – and the growth that it suggests – is excessive and puts the community at risk. We believe student enrollment should be capped at 12,370 and staff should be capped at 2,600 if the Washington College of Law is relocated to the Tenley campus or other residentially-zoned property in the neighborhood. Otherwise, the existing student caps of 10,600 for students and 2,200 for staff should be maintained because of AU's use of commercial property in the neighborhood for university purposes. ANC 3D encourages the Zoning Commission to address this "commercial" loophole that allows unlimited growth. Without some measures that require AU to count all students and staff in the cap, even those enrolled in a program or attending classes in AU-owned or rented commercially-zoned space in the neighborhood, AU will have no limits on its growth potential – even with a cap.

Building Projects: ANC 3D opposes the Reeves Field Bleachers and the South Hall. ANC 3D supports the North Hall; the Beeghly addition; the Multi-Sports Gymnasium; and the Sports Center Annex with conditions. ANC 3D supports the Kay Spiritual addition; the relocation of the Washington College of Law to the Tenley Campus; the Butler Tunnel Enclosure; and the Further Processing for the Mary Graydon Center and Nebraska Hall.

East Campus: ANC 3D opposes the Further Processing of the East Campus on the basis that, as planned, (1) it will adversely affect the use of neighboring property and is not in harmony with the general purpose and intent of the zoning regulations; and (2) the application is incomplete. ANC 3D recommends a series of conditions to mitigate some adverse impacts. East Campus retail is out of character with Nebraska Avenue and will undermine existing neighborhood commercial centers. East Campus design will lead to adverse transportation impacts. AU's transportation analysis is incomplete and Transportation Demand Management (TDM) strategies are inadequate.

AU Shuttles: ANC 3D recommends AU shuttle buses be relocated from Nebraska Avenue between Ward Circle and Rockwood Parkway to the new perimeter road along the western edge of the campus to reduce congestion on Nebraska Avenue. WMATA bus stops should not be relocated, so residents are not inconvenienced.

Student Conduct: AU's Neighborhood Action Plan, incorporated into the existing campus plan as a condition to address problems with off campus student behavior, is not working. AU's enforcement has been sporadic, inadequate, and loophole-strewn. AU should engage with the community to revise the plan to ensure more timely enforcement.

Parking: Three-year trends documenting increased parking by AU students and staff in the neighborhood suggest that AU's Good Neighbor Parking Policy, incorporated into the existing campus plan to discourage and prevent parking by AU students and staff on neighborhood streets, is not working. The program should be revised to ensure more effective enforcement of parking rules, especially given plans to significantly reduce available parking on campus.

Other Conditions: ANC 3D has suggested conditions to limit sites on campus where alcohol can be served in part to limit rentals of university spaces for non-university conferences and meetings, especially during the summer; discourage AU's use of its buildings to display billboard-like banners and electronic advertising along the city's major arterial gateways in the residential neighborhood; and to address landscaping and lighting issues.

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Chairman Hood and Commissioners:

Thank you for the opportunity to testify on behalf of Advisory Neighborhood Commission (ANC) 3D on the proposed American University (AU) 10-year Campus Plan and Further Processing. ANC 3D represents residents living at American University and in the Spring Valley, Wesley Heights, Westover Place, Foxhall East, Embassy Park, Sutton Place, and Cathedral neighborhoods immediately adjacent to AU.

Introduction

The testimony I present tonight is different than the testimony I would have delivered at the beginning of these hearings. There are two reasons. First, AU's testimony and cross examination has provided more details on the campus plan proposals than what was shared with the community in meetings convened by AU over the last two years or with ANC 3D. Second, ANC 3D has had two meetings with AU officials since the July 14 Zoning Commission hearing with the purpose of seeking to bridge differences between the university and the community suggesting that we **may** have identified a pathway to possible resolution of some differences.

ANC 3D has sought such meetings with AU for more than a year and our requests have been turned down. After the July 14 hearings, however, we tried again and this time our persistence paid off. Since then, we have had two meetings with AU – the first shortened by the 5.8 earthquake. I think I can speak for my AU friends and neighbors in saying we never could have anticipated that agreeing to sit down, talk, and explore possible resolutions to the conflict over the campus plan would prompt the ground to shake and the earth to move.

Both meetings with AU have been productive although we have reached no formal agreements – yet. We have agreed to continue to talk. I also was invited to participate in another meeting last week between AU and a small group of Spring Valley residents about the North Hall project. It was a highly productive meeting initiated by the residents, and I am very hopeful – given the substance of that meeting – that there will be a satisfactory resolution of differences.

In short, we are talking and we have pledged to continue to talk. I hope we may be on a path to resolving many, if not all, of the issues dividing us. But, we have more work to do. I hope that you will do all you can to encourage these continued discussions.

2) ANC 3D's Review Of The 2011 AU Campus Plan Has Been Guided By DC Zoning Regulations and the DC Comprehensive Plan

ANC 3D's review of the AU Campus Plan has been guided by the District Elements of the DC Comprehensive Plan and Subsection 210 of the Zoning Regulations, which permits university usage in a residential zone if it is not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions. These standards did not give us the luxury of a straight up or down vote, especially given the massive scale and the potential adverse impacts of some elements of the proposed plan.

In assessing whether AU's proposals are both reasonable and appropriate, ANC 3D finds that AU has failed to meet its burden of proof to show why the 2011 Campus Plan will not have adverse impacts on the surrounding neighborhoods. Parts of the 2011 Campus Plan are inconsistent with the provisions of Subsection 210 and fail to meet provisions of the Comprehensive Plan intended to protect residential neighborhoods. In fact, our analysis suggests that objectionable projects in the AU Campus Plan are inconsistent with 25 elements of the Comprehensive Plan covering Land Use; Transportation; Environmental Protection; Urban Design; Educational Facilities; and the Rock Creek West Area. (Attachment A, Page 19)

Consequently, ANC 3D voted to oppose the Reeves Field Bleachers, the South Hall, and the Further Processing of the East Campus; to support some projects, including the Further Processings for the Mary Graydon Center and Nebraska Hall; and support the North Hall and the Beeghly addition on the condition that they be scaled back.

The AU campus is so compact that the adverse impacts of building projects will be experienced throughout the community, not just limited to residents directly abutting the proposed projects. The basis for neighbors' strong opposition to AU's campus plan proposals, which include a significant increase in enrollment, suggest AU's growth objectives already are straining the physical size of its current campus. Even in its resolution in support of the campus plan, the AU Student Government stresses that new facilities are needed to address the conditions of "an overcrowded university."

The 2011 Campus Plan proposes nearly 900,000 gsf of new construction – almost double what AU proposed ten years ago and more than ten times what AU actually built over the last ten years. AU seeks to expand, but with little space available to expand without causing adverse impacts on the community. 70 percent of this new construction will take place within the borders of ANC 3D. Moreover, AU is proposing a 32 percent increase in its student and staff population cap – at a minimum – over the next ten years.

Overall, the proposal is out of scale for the low density residential neighborhoods surrounding the campus.

3) ANC 3D's Review Of the AU Campus Plan Has Been Comprehensive, Reasonable, And Fair

ANC 3D has worked to represent – and be sensitive – to the interests of all our constituents which include homeowners, apartment dwellers, students living both on- and off-campus, and AU, itself. In addition to the ANC's own meetings, ANC 3D Commissioners have participated in a wide range of community meetings about the AU campus plan sponsored by civic associations and homeowner groups, student groups, and individual neighbors.

ANC 3D has discussed the AU Campus Plan and related issues at eight public meetings since October 6, 2010, including two special meetings. (Attachment B, Page 26). The meetings were well attended; attendance at three of the meetings exceeded 150 people. In mid-April, ANC 3D developed a 38-page **Summary Report and Proposed Actions** on the AU Campus Plan that was distributed widely and posted on our web site for community feedback. ANC 3D received more than 200 pages in comments on the AU Plan and the **Summary Report** from neighbors for our review – most expressing strong opposition to AU’s proposals on the basis of noise, traffic, the number of students, or other objectionable conditions.

ANC 3D also retained the services of Nelson/Nygaard, an internationally-recognized transportation management planning firm that puts a high premium on sustainability strategies, to conduct a peer review of AU’s transportation analysis.

ANC 3D voted at an April 25 special meeting to approve a series of resolutions on the AU application. These resolutions were submitted previously to the Zoning Commission and are attached to our written testimony. (Attachment C, Page 28) ANC 3D supplemented its actions of April 25 by voting unanimously on June 1 to oppose AU’s newest proposal for a mid-block pedestrian signal on Nebraska Avenue NW between New Mexico Avenue NW and Ward Circle because of adverse impacts on traffic.

Throughout ANC 3D’s review process, residents consistently raised three issues that they said exacerbated the adverse impacts of projects proposed in the plan. These three issues are:

- Off-campus AU student behavior and AU’s failure to implement an effective results-oriented Neighborhood Action Plan, as mandated in the existing campus plan, which requires AU administrators to adequately manage students’ inappropriate off-campus behavior;
- Parking by students and staff on neighborhood streets and AU’s unsuccessful efforts to implement an effective Good Neighbor Parking Policy, as mandated in the existing campus plan, which requires AU to curtail parking in the neighborhood by students and faculty; and
- AU’s expressed commitment to expand its footprint by acquiring and repurposing neighborhood commercial and residential property – enabling AU to grow its presence in the community outside the purview of this Commission and the campus planning process with significant adverse impacts on residents’ quality of life, including undermining the neighborhood’s small-scale commercial centers in Spring Valley and Wesley Heights.

ANC 3D asks the Zoning Commission to address these issues as conditions of the Campus Plan.

4) AU Selected Sites For Construction Of New On-Campus Student Housing That Will Have Adverse Impacts On Residents’ Properties

AU plans to add 1,300 new and replacement beds to its on-campus student housing inventory as part of its campus plan proposal. Initially, AU justified the scope of its housing plan by saying it needs to eliminate 300 triples and its 200-bed bulk leasing arrangement with the Berkshire. Some students live three to a dorm room that reasonably accommodate two people – albeit, in some instances, by students’ choice. AU also has entered into a bulk leasing agreement with the Berkshire Apartments; students can choose this as an “on-campus housing option” despite the Berkshire’s location off campus. Rationales for the scope of the new housing construction have evolved over the course of this proceeding.

However, the existing campus plan requires AU to provide sufficient housing for 85 percent of freshmen and sophomores and 67 percent of its total undergraduate student population. However, university policy does not mandate that 67 percent of undergraduates live in on-campus housing, but only that AU have sufficient housing available to accommodate the students if they choose to live on campus. AU is now proposing to reduce this requirement from 67 percent to 55 percent. Given AU's plans to add 1,300 new beds, ANC 3D strongly opposes reduction of the current mandates.

AU's proposed 4,300 bed inventory is more than sufficient to house two-thirds of undergraduate students even if the cap is increased. AU should be able to comfortably meet the 67 percent mandate for its enrollment – with 500 beds to spare. Although AU proposes a 4,300 housing inventory, its proposals – based on numbers outlined in the June 2 report from the Office of Planning, will result in more than 4,800 beds.

Although AU identified many potential locations for new student dorms in its early discussions with neighbors, the university chose locations along the campus periphery with severe adverse impacts on residents' property, including (but not limited to) noise and traffic. Other locations on the central campus that would have posed no or fewer objections from residents were rejected by AU. In an attempt to encourage more dialogue with the university on site selection, a neighborhood group retained Rhodeside & Harwell, a highly-respected planning firm, to assess potential locations for housing on the central campus. The firm identified multiple alternative sites that would have located new dorms within existing student housing communities on the central campus. All of these options, except one (the North Hall), were rejected by AU out-of-hand without serious discussions.

AU's insistence that only locations along the campus periphery are suitable for student housing, when many of these locations are likely to create adverse impacts on residents and their property, suggests that AU may have outgrown the physical limits of its compact campus. To meet its growth needs, it may be time for AU to give more serious consideration to opening a satellite campus in another part of the city, as encouraged by the Comprehensive Plan.

5) The Tenley Campus Should Be Part Of AU's "Housing Crunch" Solution

AU also justifies the scale of its new housing program on the basis of needing to relocate existing student housing on the Tenley Campus to the main campus in order to relocate the Washington College of Law to the Tenley site. The footprint for the proposed new law school on the Tenley campus demonstrates the 8-acre site could also accommodate small-scale student housing in addition to a law school. Housing has been located for more than ten years at the Tenley site without objections from nearby residents, according to AU; the Tenley housing is convenient to a Metro station and the Wisconsin Avenue retail corridor; and Tenley's student-residents have good access to the central campus either by AU's shuttle bus system, a short 5-10-minute walk, or an even shorter bicycle ride. Although this will not endear to me my friends in ANC 3E, ANC 3D believes the Tenley campus also should continue to include housing to solve AU's housing crunch.

6) AU's Proposed Cap Should Include All Students And Staff; The Existing "Commercial" Loophole In The Cap Will Facilitate Unlimited Growth

No decision you make on the proposed plan is more critical than the proposed cap on enrollment and employees. Currently, AU is subject to a cap of 10,600 for student enrollment and a

cap of 2,200 staff. (ANC 3D notes that AU has exceeded its staff cap by about 5 percent.) This cap does not cover the Washington College of Law because it is housed in a commercially-zoned AU-owned building in the heart of the Spring Valley-American University Park neighborhoods. Residents of ANC 3D are affected by university use of this property and experience the effects of added traffic and parking on neighborhood streets – none of which were fully measured in AU’s transportation study.

Despite agreeing in its May 20 prehearing statement to a 13,600 student and 2,900 staff cap, AU officials, in response to questions from ANC 3D Commissioners at the June 1 ANC 3D Commission meeting, refused to agree to language that would count in the cap those students and staff enrolled or employed in any academic program relocated to a university-owned or rented commercially-zoned neighborhood property. Mr. Tummonds suggested in remarks to this Commission on June 9 that any student taking classes at a commercial building would “most likely be taking classes on the main campus” and thus would be counted in the cap, so residents have nothing to fear. The reality, however, is that AU could choose to relocate a graduate program or several graduate school programs or an entire academic discipline – both graduates and undergraduates – to these commercial sites in our neighborhood. These students, just like the current law school students, would not be taking any classes on the main campus and would not count in the cap.

By relocating one or more graduate programs – or a specific academic school – from the main campus to the current site of the law school once the Washington College of Law is relocated, AU could add an additional 2,000 students – at least – above and beyond its proposed cap, if such students are not covered by the cap, as is current procedure. This is what happened as a result of the last campus plan and which has led to the on-campus housing crunch now experienced by the university. The impact of AU’s proposed 13,600 cap on the community would be of a student body of nearly 16,000, if not more.

The Washington College of Law site represents just one of AU’s commercially-zoned buildings in an expanding commercial property portfolio in the heart of our neighborhood. Since 1992, AU has purchased more than 528,000 gsf of commercial space in the neighborhood resulting in the loss of neighborhood-serving retail and professional services, including medical offices. AU reports that at least 60 percent of the total floor area of these buildings is now used for university purposes.

ANC 3D believes the 13,600 student and 2,900 staff cap – and the growth that it suggests – is excessive. With AU increasing its commercial holdings significantly in recent years, this “commercial” loophole is a recipe for uncontrolled growth and further expansion of the university’s footprint into the heart of the residential community, including the small-scale commercial corridor that has traditionally served the needs of residents.

In the 2001 AU campus plan cycle, the Zoning Commission ruled that AU’s uses of commercial property could be taken into account to assess the overall impact of the campus plan on the community and its compliance with Section 210. In fact, the Zoning Commission used this rationale for recommending a reduction in the population cap then proposed by AU. We would ask this Commission to be equally creative when dealing with the impacts of AU’s expanded commercial property portfolio.

ANC 3D believes the cap should be devised to ensure that AU does not use its existing commercial holdings – or that AU is not given added incentive to purchase and repurpose additional

commercial property in our neighborhood – to circumvent the limits on growth that are an inherent objective and result of a cap.

Consequently, ANC 3D has voted to support a continuation of the existing enrollment cap of 10,600 students and a 2,200 cap on faculty. We would agree to an increase in the cap when the Washington College of Law is actually relocated to the Tenley Campus to include the current law school enrollment numbers (1,770) and the current staff (400). This would mean a student cap of 12,370 and a staff cap of 2,600.

Without some measures imposed by the Zoning Commission that would force AU to count students enrolled in a program or attending classes in AU-owned or rented commercially-zoned property in the neighborhood, AU will have no limits on their growth potential – even with the cap. Until AU agrees to language – creative or otherwise – that includes all students in the cap without regard to where they attend classes in the neighborhood, we believe the cap should encourage no additional growth, especially given all the indications that AU is overcrowded and has outgrown the size of its campus.

7) ANC 3D Actions On Proposed Building Projects

The difficulty in obtaining adequate information in a timely way from AU about all of its proposed building projects has prompted ANC 3D to suggest that some projects be scaled back. This is especially true of proposed projects abutting Spring Valley residents' homes. Although some issues can be addressed later in the Further Processing stage, some projects warrant more specific direction at this time from the Zoning Commission to provide guidance to AU and protect residents' interests.

Just like AU's presentations before ANC 3D, many of the photos used by AU in their June 9 presentation at these hearings play games with reality. This is particularly true of the East Campus and North Hall photos used in their presentation. We invite you to come see for yourself. – especially given the scope of the plan.

ANC 3D opposes the following projects as proposed by AU in the campus plan.

- Reeves Field Bleachers;
- South Hall.

A. Reeves Field Bleachers

The increase in the number of bleacher seats facing residents' homes will result in intrusive noise for adjacent neighbors on nearby streets, especially Woodway, University, and Quebec. Noise from the playing fields, which directly abut neighboring homes, has been a severe and aggravating problem for several years. The bleachers will aggravate conditions that already are objectionable.

B. South Hall

AU proposes to build a new 110,000 gsf 6-story **South Hall** student dormitory on the highest point of land to house 200 students on the south side of campus. The building will be at such a high elevation, compared with neighboring homes, that residents will be impacted significantly both by light and noise – neither of which AU has considered, as they acknowledged at the June 9 hearing.

ANC 3D supports the following building projects with conditions:

- The North Hall;
- Beeghly Addition;
- Multi-Sports Gymnasium; and
- The Sports Center Annex

C. North Hall

The North Hall will be the subject of a Further Processing application later next month. AU proposes to build a new 110,000 gsf student dormitory on the highest point of land on the north side of the campus. The Zoning Commission approved a 15,000 gsf building for the site in 2001, which was never built. There was little, if any, discussion about this project with affected residents prior to its inclusion in the campus plan.

Although the site is appropriate for development and an ideal location for new student housing given its proximity to existing dorms, the scale of the building is objectionable given the site's topography along a major city gateway and its proximity to the historic President's House on campus. The proposed elevation of the new building threatens to create a towering effect along Massachusetts Avenue and overwhelm the site.

I am pleased to report that residents and AU have entered into discussions about this project in the last week and are working collegially to consider ways to minimize the adverse impacts of this building; respect existing topography; and reflect an overall design that adds to the streetscape of the neighborhood. With more time, I am hopeful that an agreement can be reached.

D. Beeghly Hall Addition

AU seeks to add 60,000 gsf to **Beeghly Hall**. The Zoning Commission approved a 50,000 gsf addition in 1987, but AU never built the addition. The proposed addition will exceed the height of the existing building multiplying the adverse visual impacts of the already obtrusive Beeghly Building. The addition should be reduced by one floor to correspond in height with the existing structure. But, I am pleased to report again that Spring Valley residents and AU have been discussing ways to improve landscaping design in the area near Beeghly to mitigate the impacts of the existing building. Although we are hopeful that AU and the residents will reach an agreement on this project, our support for the Beeghly addition is conditioned on eliminating one floor which would reduce the addition to 50,000 gsf.

E. Multi-Sports Gymnasium and Sports Center Annex

The **Multi-Sports Gymnasium and the Sports Center Annex** will be closer than any current structures to the homes that face them on University Avenue. The generic visual renderings provided by AU show the proposed structures as viewed from the campus interior, but the university provides no view from the west where neighboring homes are located. In the absence of adequate information from AU, the interests of residents can be protected by shrinking the footprint of both buildings, as outlined in our resolution submitted to this Commission. More discussions between the affected residents and AU also could address many of these concerns as this process continues to evolve.

ANC 3D supports the following projects as proposed in the AU Campus Plan:

- The Kay Spiritual Center addition;
- The relocation of the Washington College of Law to the Tenley Campus; and
- The Butler Tunnel Enclosure.

We do not believe these projects in principle are likely to create adverse impacts; however, we acknowledge serious questions about the Tenley Campus and the impact on traffic and parking for residents. These need to be addressed by AU in greater detail as part of the Further Processing. The closing of the **Butler Tunnel**, which was approved by the Zoning Commission ten years ago, could lead to a better use of space on the central campus, including possibly for construction of new student housing. This also makes it more feasible and practical for AU to reroute its shuttle buses off Nebraska Avenue as a way to reduce existing traffic congestion on Nebraska Avenue between Ward Circle and Rockwood while also providing improved shuttle bus access to the university community. AU's planning as reflected in the 2011 Campus Plan proposals falls short of the imagination needed to fully realize the benefits of closing the Butler Tunnel for student housing options and improved transportation management policies.

ANC 3D also supports the Further Processing for:

- Nebraska Hall; and
- The Mary Graydon Center.

We note, however, that the Mary Graydon Center addition – located at the campus core – will only be 40 feet high; yet AU proposes other buildings adjacent to residents' homes that have significantly higher elevations. As AU works to beautify and preserve open space on the central campus, it seeks to eliminate the neighborhood buffers that now exist.

8) ANC 3D Opposes Further Processing Of East Campus

ANC 3D opposes AU's request for Further Processing of the East Campus at this time on the basis that, as planned, (1) it will adversely affect the use of neighboring property and is not in harmony with the general purpose and intent of the Zoning regulations, and (2) the application is incomplete.

As proposed, the development is “likely to become objectionable to neighboring property because of noise, traffic, number of students,” and other objectionable conditions. AU has failed to mitigate the adverse impacts of its proposal. ANC 3D has outlined a series of conditions that could address these adverse impacts, including (but not limited to):

- Reducing the overall intensity and the number of students housed at the site;
- Removing all retail from the proposed site; and
- Establishing a 120-foot landscaped buffer – as opposed to so-called “buffer” buildings that add to the intensity of the site and create their own objectionable visual and noise impacts.

ANC 3D believes the East Campus development, as proposed, is too intense. Of the seven buildings planned for site, three are more than twice as high as the neighboring town homes. As now planned, this large-scale development will add to existing traffic congestion in the neighborhood; that

the retail component is inconsistent with existing land uses along the Nebraska Avenue corridor; that the proposed buffer of low-rise buildings is inadequate to protect residents from adverse visual and noise impacts; and will alter the character of the low density Wesley Heights, Spring Valley, and Westover Place residential neighborhoods adjacent to the site.

ANC 3D recommends also that the Nebraska Avenue surface parking lot on the East Campus along the Massachusetts Avenue side of Ward Circle be eliminated and turned into green space as a buffer with the surrounding neighborhoods – even if this requires AU to increase the amount of underground parking at the site. This will have the effect of reducing overall density and create a more balanced physical environment at the 8-acre site. Additionally, conditions need to be imposed that would prevent any amplified events from being held on the East Campus given its close proximity to neighbors and the lack of any sound buffer.

ANC 3D notes that AU's Further Processing did not include a storm water management plan for review by residents and the District Department of the Environment (DDOE). Although such review is not required as part of this application process, stormwater management is a critical issue given the area's topography and what we know of groundwater flow in the area. A review by DDOE of AU's stormwater management plan would good practice, especially for projects in this area of the city. We would encourage AU to voluntarily seek such review, and, if not, you should mandate it..

We are particularly concerned that the transportation analysis for this project is woefully incomplete, if not misrepresentative of reality. The minimal design information provided by AU also suggests a series of monolithic box-like structures, especially on its border with the Westover Place townhomes. We also would recommend that AU voluntarily provide information for residents' review about any potential contamination at the site stemming from its use by the Army when AU housed the largest chemical weapons experimental station in the world during World War I.

Although AU has filed an application for Further Processing, its plans for the site seem still to be evolving. For example, it is unclear which space in Buildings 4 and 6 will be designated for academic uses which may pose more significant adverse lighting, noise, and population impacts, especially for the so-called "buffer" buildings. AU even appears not to have designed a loading area for its proposed retail in buildings 1, 2, and 5. There are no plans in place for parking tied to the retail uses of the site.

On the basis that the Further Processing lacks sufficient detail, it should be rejected at this time by the Zoning Commission and AU should be encouraged to work more closely with residents and ANC 3D to mitigate objectionable adverse impacts of its proposal.

9) Proposed East Campus Retail Is Out Of Character and Will Undermine Existing Neighborhood Commercial Centers

ANC 3D opposes retail at the East Campus. Nebraska Avenue is unique in that it is characterized by residential and institutional uses, like churches and schools, including Woodrow Wilson High School, Alice Deal, the National Presbyterian Church, and the United Methodist Church; and the U.S. Naval Annex that houses the U.S. Department of Homeland Security (DHS); and stately homes for the Japanese and Swedish ambassadors. If approved as part of this plan, this would be the only block with retail on Nebraska Avenue throughout its length in Washington, D.C.

OP said it best: AU's retail plans for the East Campus "would introduce land uses that are not anticipated on the site, called for in the Comprehensive Plan, or allowed as a matter-of-right under zoning."

Retail at the East Campus site also will undermine the existing Wesley Heights commercial corridor. Specifically, AU-owned retail at the commercially-zoned Sutton Center in the heart of Wesley Heights has been empty for nearly two years. AU says it has been unable to fill that space. AU recently decided to convert nearly half of the Sutton Center retail space into a university mail room and enrollment services center. In choosing this option, AU rejected an offer from a successful Washington, D.C. restaurateur to open a gourmet grocery at the site. A gourmet grocery operated at the site since the building's construction in 1980 only to leave after AU's purchase of the property.

AU also has underestimated the potential adverse transportation impacts of locating retail at the East Campus site. AU's transportation analysis is based on adding student-serving specialty retail at the site. However, AU has not spelled out the specific uses for the retail to be located on the East Campus – except to suggest in these hearings that its targets are Apple Computer and Panera Bread – both of which are likely to attract a regional non-student population – so, the analysis of the transportation impacts is simply not reliable.

10) East Campus Design Will Lead To Adverse Transportation Impacts

As suggested in the Rock Creek West Element of the Comprehensive Plan (RCW-1.1.12), an assessment of the impact of AU's Campus Plan on traffic should not be made in isolation from proposed plans by the U.S. General Services Administration (GSA) to expand the Nebraska Avenue Complex (NAC) – adjacent to the East Campus site – that now houses the headquarters of the U.S. Department of Homeland Security (DHS). GSA's plans, which are expected to be realized during the next ten years, are expected to double the building space at the 37-acre site to 1.2. million gsf. GSA would add nearly 2,000 new workers doubling the number of DHS workers commuting to the Ward Circle site. GSA reports more than half of all DHS workers access the NAC site from the Virginia suburbs by way of Nebraska Avenue where AU is planning the East Campus "residence community."

Non-resident commuter traffic has increased dramatically in the last ten years along the Massachusetts and Nebraska Avenue corridors which have now become major arterial gateways to the city. AU-related pedestrian traffic also has increased significantly because of the increase in the number of student rentals at two Ward Circle rental apartment buildings, including as a consequence of AU's bulk-leasing agreement with the Berkshire. Increased usage of unsignaled pedestrian crosswalks at Ward Circle – less than one block from signaled crossings – has led to additional vehicle back ups and dangerous pedestrian conditions.

Traffic congestion along New Mexico, Nebraska, and Massachusetts Avenues has pushed traffic to neighborhood streets. Residents along Quebec, Rodman, 49th, and Tilden Streets and University Avenue and Rockwood Parkway in Spring Valley and along Newark, Macomb, and 45th Streets in Wesley Heights complain routinely about cars cutting-through the neighborhood and speeding on their streets to avoid the congested Ward Circle corridor. Speed bumps were added in recent years in front of Horace Mann Elementary School to slow down cut-through traffic using Newark Street. Residents are demanding more traffic calming measures on local streets throughout the Spring Valley and Wesley Heights neighborhoods.

Both AU and GSA have assessed conditions at Ward Circle as part of their transportation studies. Both studies agree that traffic growth by the year 2020, in the words of Gorove/Slade, "will

lead to congestion on several commuter routes, including Ward Circle in the morning and evening peak hours.” Both studies acknowledge locations within the vicinity of AU and the NAC that already have “unacceptable levels of delay.” These include Massachusetts Avenue at Ward Circle.

The Gorove/Slade study concludes that unacceptable traffic conditions will exist in 2020 with or without the AU expansion. Kimley-Horn and Associates has said the same in reference to the GSA’s plans for expansion of the NAC site. Both argue their separate contributions to the traffic congestion are minimal, so they should not be required to forego or revise their expansion plans to help ease the unacceptable traffic conditions. Whether minimal or not, both AU and DHS are currently contributing to the congestion in our neighborhood. The combined impact – which has not been assessed – offers dire prospects for the deterioration of transportation systems at Ward Circle and along Nebraska and Massachusetts Avenues.

AU’s proposal to add a mid-block pedestrian traffic signal on Nebraska Avenue between New Mexico and Ward Circle will exacerbate traffic congestion in the area and generate even more pedestrian-vehicle conflicts. With this mid-block signal, motorists will have to make their way through the cycles of five traffic signals to drive three short blocks from Foxhall Road to Ward Circle in either direction. This will push more arterial traffic onto neighborhood streets to avoid the delays and congestion. AU’s traffic study fails to assess the impact of this added congestion on neighborhood streets.

11) AU Transportation Demand Management (TDM) Strategies Are Insufficient; AU Should Reroute Its Shuttle Bus Traffic On Campus To Relieve Nebraska Avenue Congestion

AU is also not proposing effective Transportation Demand Management (TDM) strategies, including adequate incentives for carpooling. DDOT should work with AU to develop other strong and enforceable mitigation measures that might go so far as limiting and staggering the arrival and departure times of staff driving to campus. Similar to traffic mitigation efforts required by Montgomery County, this will serve as an added incentive for staff to use mass transit or carpool.

AU proposes to relocate bus stops, including WMATA bus stops along Nebraska Avenue, to reduce the congestion caused by its shuttle bus traffic. Relocating WMATA bus stops will unnecessarily inconvenience residents – many of whom are senior citizens and rely on WMATA for local transportation needs. Other more creative TDM strategies could reduce bus-related congestion on Nebraska Avenue.

For example, ANC 3D has proposed that all AU shuttle buses be removed from Nebraska Avenue stretching from Ward Circle to Rockwood Parkway. Alternatively, AU’s shuttles can access the campus through the main Glover Gate along Massachusetts Avenue, travel through the main campus along the newly proposed western perimeter road at close proximity to current student housing, turn around at the bus depot on the south side of campus (where there is adequate space for a turn-around), and then depart the campus along the same route out the Glover Gate. The campus is so compact that the new route could also provide service for the East Campus. ANC 3D believes shuttle bus use of Rockwood, which is a narrow two-lane heavily-travelled neighborhood street, should be terminated upon approval of the 2011 Campus Plan. AU should be required as part of the Further Processing to assess the impact of this alternative shuttle routing on current Nebraska Avenue traffic conditions.

12) Other Conditions: AU Fails To Effectively Address Adverse Impacts Of Student Behavior and AU Parking In Neighborhood Despite Existing Campus Plan Conditions

Neighbors in Spring Valley, Wesley Heights, and Westover Place report unprecedented problems stemming from students' behavior off-campus. AU administrators would have this Commission believe the problems are only a bunch of noisy students slamming car doors. Complaints range from students using residents' front yards as dumping grounds for beer cans and other trash to using the front yards as toilets after late night drunken binges. Neighbors report parties at student group homes that are so loud that residents are unable to sleep; trash and broken bottles littering the students' yards or the alleys behind the homes preventing residents from accessing garages located off the alley; and loud parades of students as they travel from the central campus through the neighborhood streets on their way to off-campus party locations. Residents report their homes have even been egged in retribution for complaining to AU and MPD. (Attachment D, Page 35)

First, not all AU students engage in unruly behavior and it is unfair to brand all students for the bad behavior of the few. But, second, these behavioral issues are not a function of inadequate on-campus housing or limited to students who actually live off-campus. Student group homes in the neighborhood are magnets for students living on-campus in search of a party. Even one problem group home, especially given the neighborhood's density, can have a significant adverse impact on the whole neighborhood and residents' quality of life.

In 2001, the Zoning Commission required AU to implement a "Neighborhood Action Plan" to address off-campus conduct by students. Under the terms of this condition, AU was required "to charge students under its Student Conduct Code" for bad behavior off-campus. AU waited until August, 2010 to begin applying its Student Code of Conduct to off-campus student behavior – despite years of persistent complaints from residents.

As part of a separate AU-related zoning matter in 2007, ANC 3D told the Zoning Commission that the Neighborhood Action Plan was not working. We reported then that AU had failed to address residents' persistent complaints about some AU students' off-campus behavior. This is documented as Attachment E of my written testimony. (Attachment E, Page 37) We asked AU at that time to work with neighbors to improve the program. AU led this Commission at the time to believe the issue was being addressed; AU has not and the problems have worsened, especially over the last year.

As we learned on June 9 at these hearings, AU has created a bureaucracy with an orientation focused on "judicial-like" proceedings. It relies on residents to identify the offending students by name and filling out a complaint form for AU administrators to take action. As with any judicial process, AU focuses on whether there is "the preponderance of evidence" – other than police reports – and "witnesses" – apparently other than the residents who report the bad behavior – who can substantiate the bad behavior. We are told that students living in an off-campus unit will not even be held responsible for the actions of those who use the home for partying and other objectionable behaviors. So, the objectionable bad behavior continues.

We must insist that AU be more creative in its management of off-campus student conduct than to rely solely on judicial-like proceedings that lead to no resolution.

When persistent problems continue at the same location for the academic year or are only solved when the tenants move to another location or graduate, then it is clear that AU's enforcement

efforts are not working. Although AU has pledged to retain the Neighborhood Action Plan as a condition of the 2011 Campus Plan, the university should be required to engage the community, including its student population, in a meaningful dialogue to make changes in the program that will (1) improve communications between residents and administrators; and (2) result in more effective and timely resolution of problems. These discussions should begin immediately with the outcome included as a condition of this campus plan.

Additionally, AU also should be required to develop a more effective Good Neighbor Parking Policy, which is also mandated under the existing campus plan. Neighbors continue to complain about the number of students and staff parking on residential streets. More than 6,000 citations were issued last year by AU. The increase in the number of AU-issued parking citations over the years suggests the program is not having the desired effect of reducing student and staff parking in the neighborhood. (Attachment F, Page 49) Given AU's plans to reduce the overall number of parking spaces on campus without adequately assessing the full impact on neighborhood parking, AU needs to implement enforcement efforts that change student and staff parking patterns.

Conclusion: ANC 3D Encourages Meaningful And Continued Dialogue To Build Compromise And Consensus

We are hopeful that the new dialogue established between ANC 3D and AU since the last Zoning Commission hearing will make this a better plan and one that is more acceptable to residents. So far, our two discussions have been frank, but positive and reflected a willingness to explore ways to compromise. We recognize there are very strongly held views in our community, but we are prepared to try to lead our community to an amicable resolution with AU. Although this will require compromise on the part of residents, it will also require compromise on the part of AU. We are not so naïve as to think that all issues are likely to be resolved or that we even have sufficient time – given the schedule of these proceedings – to reach resolution on issues, including the design of the East Campus. But, I want to assure you that we are committed to do all we can to build a bridge between AU and the residents and work to resolve differences. We are looking forward to continued discussions with the university.

Nevertheless, it is our testimony today that AU has failed to meet the burden of proof to show why this plan will not have an adverse impact on the surrounding neighborhoods. We believe elements of this plan are inconsistent with subsection 210 of the DC Zoning Regulations and the Comprehensive Plan and are not reasonable or appropriate. We encourage you to send the objectionable elements of the plan back to AU and instruct the university, the ANC, and residents to enter into meaningful discussions and address all parties' concerns with a goal of compromise and consensus.

Attachment A
AU Campus Plan Inconsistencies With The
Comprehensive Plan For the National Capital: District Elements

Element Number	Element	AU Campus Plan Inconsistency
Land Use (LU)-2.1.5	<p>Conservation of Single Family Neighborhoods: “Carefully manage the development of vacant land and the alteration of existing structures in and adjacent to single family neighborhoods in order to protect low density character, preserve open space, and maintain neighborhood scale.”</p>	Proposed development is too intense and out of scale for low density residential neighborhoods immediately surrounding AU Campus.
LU-2.2.4	<p>Neighborhood Beautification: “Encourage Projects which improve the visual quality of the District’s neighborhoods, including landscaping and tree planting, façade improvement...”</p>	AU proposal does not include adequate landscaped buffer with residential neighborhoods; North and South Halls will negatively impact visual quality of Spring Valley; lack of landscaping plan; facades of new buildings will alter and damage visual appeal of community.
LU-2.3.2	<p>Mitigation of Commercial Development Impacts: “Manage new commercial development so that it does not result in unreasonable and unexpected traffic, parking, litter, view obstruction, odor, noise...establish requirements for traffic and noise control, parking and loading management, building design, hours of operations and other measures as needed to avoid such adverse effects.”</p>	Proposed new retail on East Campus will lead to More traffic and congestion Along the most heavily congested corridor in the Neighborhood. AU has provided no information on how retail will be used or managed to avoid adverse impacts.
LU-2.3.5:	<p>Institutional Uses: “Ensure when such uses are permitted in residential neighborhoods, they are designed and operated in a manner that is sensitive to neighborhood issues and that maintains quality of life.”</p>	AU Campus Plan proposals Will create objectionable conditions for residents of Spring Valley, Wesley Hts, and Westover Place and have a significant negative impact on overall quality of life.

Transportation (T) -1.1.1	<p>Transportation Impact Assessment: “Require full environmental impact statements, including … rerouting of traffic from roads classified as principal arterials or higher onto minor arterials or neighborhood streets with lesser volume.”</p>	<p>AU transportation study was limited to streets immediately surrounding main campus, but did not include areas where AU owns commercial property used by students and staff; study did not assess impact on the surrounding neighborhood streets</p>
T-1.1.2	<p>Land Use Impact Assessment: “Assess the transportation impacts of development projects using multi-modal standards rather than traditional vehicle standards to more accurately measure and more effectively mitigate development impacts on the transportation network.”</p>	<p>AU transportation study assesses pedestrian traffic at peak vehicle hours instead of peak pedestrian hours demonstrating the study’s bias and its failure to provide a more accurate assessment of community impact based on the combination of added pedestrian, bicycle, and vehicular traffic.</p>
T-2.4.4	<p>Sidewalk Obstructions: “Locate sidewalk cafes and other intrusions into the sidewalk so that they do not present impediments to safe and efficient pedestrian passage.”</p>	<p>East Campus design, including new outdoor retail eating areas, will create further congestion at the corner of New Mexico and Nebraska, the main pedestrian crossing for the East Campus, creating additional safety risks that have not been mitigated.</p>
Environmental Protection (E)-3.4.1	<p>Mitigating Development Impacts: “Take measures to ensure that future development mitigates impacts on the natural environment…construction practices which result in unstable soil and hillside conditions or which degrade natural resources without mitigation shall be prohibited.”</p>	<p>Development of North and South Halls along fragile and pristine hillsides will have a negative impact on the environment and pose additional environmental risks to homes in Spring Valley already vulnerable to storm water runoff; East Campus further processing lacks a storm water management plan to mitigate the environmental impact of new construction at the site.</p>
Urban Design (UD)-1.2.1.	<p>Respecting Natural Features in Development: “Respect and perpetuate the natural features of Washington’s landscape. In low-density, wooded or hilly areas, new construction should preserve natural features rather than altering them to accommodate development.”</p>	<p>Proposals to develop the North and South Halls on pristine hillsides – without taking steps to preserve these natural features – will permanently alter the existing topography that enhances the quality of life for residents.</p>

UD-1.2.4	<p>View Protection: “Recognize and protect major views in the city, particularly characteristic views of city landmarks and views from important vantage points. Recognize the importance of views to the quality of life in the city and the identity of Washington and its neighborhoods.</p>	<p>Locating the North Hall on a steep embankment will create a towering effect on Massachusetts Avenue and overshadow the architectural importance of the AU President’s Office Building, which is a visual landmark for those walking or driving along Massachusetts Avenue. Construction of the South Hall on the steepest embankment on the South side of the campus will have a negative visual impact on residents of Spring Valley bordering the campus.</p>
UD-1.4.2	<p>City Gateways: “Create more distinctive and memorable gateways at points of entry to the city and points of entry to individual neighborhoods and neighborhood centers. Gateways ...should be designed to make a strong and positive visual impact.”</p>	<p>Spring Valley is the gateway for people entering the city from Maryland; visitors will be greeted by the towering effect of the North Hall that will have a negative visual impact. Ward Circle is the first Circle gateway and visitors will be greeted by unattractive institutional-looking facades of the proposed student dorms on the East Campus. This will not create a strong or positive visual impact.</p>
UD-1.4.3	<p>Avenue/Boulevard Vista and View Corridors: “Protect views and view corridors along avenues/boulevards...Vistas along such streets should be accentuated by improving landscaping and requiring the highest architectural quality as development takes place.”</p>	<p>The towering effect of the North Hall will have negative impact on the view along Massachusetts Avenue, a major DC gateway. The East Campus proposal will have a negative impact on Nebraska Avenue. Locating student housing east of Nebraska Avenue on a new East Campus effectively transforms Nebraska Avenue into an internal corridor of the university; the retail is out of character as there is no retail on Nebraska Avenue in DC; it is primarily a street distinguished by residences, churches, schools, and embassy-related buildings. The design facades of new buildings for Nebraska Avenue are not architecturally distinguished and resemble institutional boxes.</p>

		Proposed set backs for the eastern side of Nebraska are less than the western side crating a sense of being out of balance. The visual appearance of building heights is larger on the Eastern side than the western side because of the larger mass of the East Campus buildings.
UD-2.2.5	Creating Attractive Facades: “Avoid monolithic or box-like building forms ... which detract from the human quality of the streets.”	East Campus and North Hall building designs are egregiously monolithic and box like. The AU Plan is characterized by a single undistinguishable architectural design for all of its proposed new buildings that adds little character to the surrounding community.
UD-2.2.6	Maintaining Façade Lines: “Generally maintain the established façade lines of neighborhood streets...”	The façade lines of buildings on the East Campus will be inconsistent with buildings on the western side of Nebraska Avenue (directly across the street) because the East Campus setback is less than the setback on the western side of Nebraska Avenue.
UD-2.2.10	Surface Parking: “Parking should be designed so that it is not the dominant element of the street and should be located behind development rather than in front of it.”	Continuing to operate a surface parking lot at Ward Circle – instead of adding more underground parking as part of the East Campus development – is inconsistent with this element. Surface parking when combined with a monolithic, box-like building design will have a negative visual impact.
UD-2.2.11	Parking Structures: “Encourage creative solutions for designing structured parking to minimize its visual prominence.”	Surface parking lot at Nebraska should be eliminated in favor of expanding underground parking at the East Campus site to minimize visual prominence of surface parking lot.”
Educational Facilities (EDU)-3.3.2	Balancing University Growth and Neighborhood Needs: “Discourage university actions that would adversely affect the character or quality of life in surrounding residential areas.”	AU Campus Plan proposals locate student housing (East Campus, North and South Halls) at the edge of campus in ways that are objectionable to residents creating adverse impacts of noise, traffic, and other conditions; proposals to expand the bleacher seats at the

		<p>Reeves Field adjacent to a quiet residential neighborhood without mitigating noise impacts; and failing to limit the growth of the number of students, faculty, and staff in a reasonable way adversely affects the character and quality of life for residents.</p>
Rock Creek West Area (RCW)-1.1.1	<p>Neighborhood Conservation: “Protect the low density, stable residential neighborhoods...Future development in both residential and commercial areas must be carefully managed to address infrastructure constraints and protect and enhance the existing scale, function, and character of these neighborhoods.”</p>	The growth proposed in the AU Campus Plan is out of scale for the low density residential neighborhoods surrounding the campus; if approved, the impacts will permanently alter the way the neighborhoods function on a daily basis, including transportation patterns; and will permanently alter the character of these low density primarily single family residential neighborhoods.
RCW-1.1.5	<p>Preference for Local-Serving Retail: “Regardless of scale, retail development must be planned and designed to mitigate traffic, parking, and other impacts on adjacent residential areas.”</p>	Proposed retail at the East Campus will increase traffic congestion along Nebraska Avenue resulting in a negative impact on residential areas.
RCW-1.1.8	<p>Managing Institutional Land Uses: “Manage institutional land uses in a way that ensures that their operations are harmonious with surrounding uses, that expansion is carefully controlled, and that potential adverse effects on neighboring properties are minimized. Ensure that any redevelopment of institutional land is compatible with the physical character of the community and is consistent with all provisions of the Comprehensive Plan and the underlying zoning rules and regulations. Densities and intensities of any future development on such sites should reflect surrounding land uses as well as infrastructure constraints and input from the local community.”</p>	The AU Campus Plan proposes excessive growth in population and construction and at locations that will have a particularly adverse impact on residential neighborhoods surrounding the campus. The plan proposes a level of growth in population and construction that is incompatible with the low density single family residential neighborhoods surrounding the campus. The plan will further strain already strained transportation systems. Moreover, the plan fails to reflect the overwhelming sentiment of the local community.
RCW-1.1.9	<p>Protecting Common Open Space: “Protect the large areas of green space and interior spaces that are common in and around the community’s institutional uses...”</p>	The AU Campus Plan proposes to develop open areas that buffer neighbors on the east, north, and south sides of campus in favor of opening more green space internal to the campus.

RCW-1.1.11	<p>Managing Transportation Demand: “Improve Traffic service levels on the area’s thoroughfares by developing transportation systems management programs, transportation demand management programs, and other measures to more efficiently use the area’s road network and reduce the volume of vehicle trips generated by new development. Ensure that new development does not unreasonably degrade traffic conditions, and that traffic calming measures are required to reduce development impacts. This policy is essential to protect and improve the quality of life and the residential character of the area.”</p>	<p>The AU Campus Plan will result in deteriorating traffic conditions along Massachusetts, Nebraska, and New Mexico Avenues; encourage more traffic through neighborhood streets to avoid congested corridors; and create additional safety risks associated with vehicle-pedestrian conflicts. Proposed TDM initiatives are inadequate to mitigate the impact of the proposals.</p>
RCW-1.1.12	<p>Congestion Management Measures: “Ensure that land use decisions do not exacerbate congestion and parking problems in already congested areas...Traffic studies and mitigation plans should consider not only the impacts of the projects under consideration but the cumulative impact of other projects which also may impact the community, as well as the impact of non-resident drivers using local streets.”</p>	<p>The proposed East Campus development will have a negative impact on existing traffic congestion along the Nebraska-New Mexico-Massachusetts Avenue corridors. AU’s traffic study does not consider the impact of the expansion of the U.S. Department of Homeland Security at the Nebraska Avenue Complex (NAC), including the number of commuters that will be using Nebraska Avenue as an access point to the NAC site. The transportation study also assessed impact only by counting cars entering the campus gates and did not assess the impact on neighborhood streets, especially of traffic seeking to avoid congestion on Nebraska, New Mexico, and Mass. Avenues. The study also fails to assess the impact of the retail operations on the East Campus proposing to study this at a later date only if traffic conditions worsen in direct conflict with the Comprehensive Plan.</p>

RCW-1.2.1	<p>Urban Design Focus: “Focus urban design efforts on … major avenues… and areas with significant environmental and topographical features.”</p>	<p>Development of North and South Halls threatens environmental stability and distinguished topographical features of the Spring Valley Neighborhood. Development of the North Hall and the East Campus pose a threat to the Massachusetts and Nebraska Avenue vistas.</p>
RCW-1.2.2	<p>Scenic Resource Protection: “Conserve the important scenic and visual resources, including neighborhoods developed on hilly terrain on or near stream valleys, such as Spring Valley.”</p>	<p>Proposals for the North and South Halls on hilly terrain that distinguishes the Spring Valley community will have a negative impact on the scenic and visual resources of the neighborhood.</p>

Attachment B
ANC 3D Meetings On AU Campus Plan and Related Issues

Date	Topic	Attendance	Summary
October 6, 2010	Update From AU Reps On Status Of Discussions With Neighbors On AU Campus Plan	25	Neighbors express concerns over AU proposals on housing; criticize AU for failure to enact effective neighborhood parking restrictions; cite AU's failure to fill retail space at Wesley Hts. commercial center; AU indicates openness to revising housing proposals; residents complain about impact of student behavior off campus.
December 1, 2010	Transportation Impacts Of AU Campus Plan	40	Residents indicate AU traffic analyses underestimates impact on transportation and neighborhood gridlock.
February 2, 2011	Transportation Impacts at Ward Circle Of AU Campus Plan and NAC expansion proposals	50	Presentation from General Services Administration (GSA) on NAC expansion plans and impact on traffic at Ward Circle; GSA reports it is not working closely with AU to assess combined impacts of transportation proposals.
February 7, 2011 (Special Meeting)	Draft AU Campus Plan Proposals	150	AU presented draft of its campus plan; residents complained of a "total disconnect" in AU-community discussions; neighbors complained about AU's rejection of a proposal to fill open retail space in commercial corridor with a grocery store in favor of student-serving retail; residents emphasize student housing should continue on Tenley campus; suggest other proposals will have adverse impacts on neighbors' property and quality of life; residents cite transportation impacts of combined AU-NAC expansion; and cite off campus student behavior as an adverse impact.
March 2, 2011	Wesley Heights residents' concerns on AU Campus Plan; AU-related transportation issues	50	Wesley Heights residents present petition to ANC opposing AU campus plan proposals; DDOT makes presentation on existing gridlock and safety issues at Ward Circle indicating major infrastructure improvements are needed, but there are no funds available.
April 6, 2011	AU Campus Plan Filing	150	Presentation by AU reps; residents complain the plan will have adverse impacts; AU indicates it will not have further discussions unless neighbors agree to pre-conditions accepting elements of campus plan proposals. Neighbors complain AU has ignored residents' concerns. Agreeing to AU's pre-conditions, ANC 3D invites AU to enter into discussions with a goal of creating a compromise plan. AU says it will consider request, but does not respond.

April 25, 2011 (Special Meeting)	AU Campus Plan Filing	150	Residents comment on ANC 3D Summary Report and Proposed Actions; ANC 3D votes to support some elements of the plan; support other elements with conditions; and oppose elements of the plan, including Further Processing of East Campus.
June 1, 2011	Changes To AU Campus Plan Outlined In AU Pre-Hearing Filing	25	AU makes presentation on proposed changes; ANC 3D congratulates AU on changes, but says they do not go far enough; opposes addition of new traffic signal as a TDM measure on Nebraska Avenue on the basis that it will exacerbate gridlock and have an adverse impact on residents, including pushing traffic onto neighborhood streets.

Attachment C
ANC 3D Actions On American University 2011Campus Plan
Case No. 11-07
Approved June 1, 2011

Mid-Block Pedestrian Traffic Signal On Nebraska Avenue

ANC 3D opposes the location of a pedestrian traffic signal mid-block on Nebraska Avenue NW between Ward Circle and New Mexico Avenue NW, as outlined in AU's May 20 prehearing statement to the Zoning Commission, because it will exacerbate existing traffic congestion along the Nebraska-New Mexico-Massachusetts Avenues corridor.

Approved 8-0

ANC 3D Actions On American University 2011Campus Plan
Case No. 11-07
Approved April 25, 2011

Capping The Number of AU Students And Employees

ANC 3D concludes that American University (AU) student enrollment should be subject to a cap of 10,600 for student enrollment and 2,200 for employees (faculty and staff) during the life of the campus plan. The cap would be increased by 1,770 (the current enrollment at the Washington College of Law) when the law school is relocated to the Tenley campus; and then reduced by the number of students relocated from the campus located on residentially-zoned property to the 4801 Massachusetts Avenue site or any other commercially-zoned space throughout the life of the campus plan. Online students and employees who have no physical presence at the university in the community would be exempt from the cap requirements. American University may propose an amendment to its campus plan to offer a reasonable increase in the cap after it has completed building the new Washington College of Law in order to enable the university to realize its longer-term objective to grow its law school student population

Approved 8-1 (Jones opposed)

Student Housing

ANC 3D concludes the neighbors' objections to the student housing proposals in the AU Campus Plan are both credible and reasonable and rejects the AU Campus Plan proposals on student housing, as now proposed by AU, because they would not be in compliance with Section 210.2 of the DC Zoning Regulations, on the basis that these projects are "likely to become objectionable to neighboring property because of noise, traffic, number of students, and other objectionable conditions." AU has failed to justify the need for 1,290 new student beds. Based on the statistics provided by AU, the plan for building 1,290 new beds is excessive and will lead to objectionable conditions. ANC 3D encourages the Zoning Commission to demand that AU revise the housing components of its campus plan in consultation with neighborhood groups and address neighbors' concerns by engaging in a meaningful dialogue with the community with the goal of achieving an outcome that will enable AU to meet its student housing needs without creating conditions that are

likely to become objectionable for neighboring residents. These plans – at a minimum – should incorporate the following specific conditions:

General Conditions

- There is a need for new student housing, but the preference is that this housing should be located on sites at the core of the campus that do not create objectionable conditions for neighbors living adjacent to the university.
- AU's wildly fluctuating numbers for student housing do not offer confidence that AU has made a well-informed assessment of its housing needs. AU must clarify and better demonstrate how many housing units are required to meet its needs – and then fully engage its neighbors in a meaningful dialogue that leads to a student housing plan that does not create objectionable conditions for neighbors. This dialogue should include discussions of continuing use of the 8-acre Tenley campus site also for small-scale undergraduate student housing.
- All student housing must have a minimum 120-foot landscaped buffer – that includes mature trees – with any neighboring residential property.
- Student residences should be built with tinted windows that shield from residents' views the type of window hangings that are characteristically found in the windows of AU's student dorms and the effect of lighted windows throughout the evening.
- The existing mandate that AU be required to have enough housing available for 85 percent of freshmen and sophomores and two-thirds of all undergraduates if they choose to live on campus should be retained.
- Although high rise student housing is not appropriate along Nebraska Avenue; any student housing planned for Nebraska Avenue should reflect the low-density housing model provided by the Clark and Roper Halls.
- Heights of buildings should be consistent with the settings.

East Campus Conditions

- The East Campus development as proposed by AU is inconsistent with DC Zoning regulations because it is “likely to become objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions;” AU also has failed to mitigate conditions that would make housing at the site objectionable.
- Setbacks along Nebraska Avenue at the East Campus should be identical to the 85-foot setbacks on the western side of Nebraska Avenue; building heights on the East Campus should be no taller than and in scale with the buildings on the Western side of Nebraska Avenue; setbacks along New Mexico Avenue at the East Campus should be no less than the setbacks along Rockwood Parkway at the Clark site.
- AU should install a fence at the rear of the site to provide an additional buffer with the community – the height and style of which should be determined in consultation with the Westover Place neighbors.
- Student-serving retail as part of the East Campus project across and along Nebraska Avenue is out of character with Nebraska Avenue and adds to an already congested and hazardous traffic corridor at Nebraska and New Mexico Avenues. Student-serving retail should be located at the core of the campus (not east of Nebraska Avenue) so as to be convenient for student use, increase pedestrian-vehicle conflicts along the heavily congested Nebraska Avenue corridor, and in a way that does not interfere with neighbors' enjoyment of a primarily low-density residential neighborhood environment.

- Additional information is required to evaluate the Further Processing Request for the East Campus site, especially since AU has not provided – despite our requests – adequate information on its storm water management plan, the location of its mechanical equipment in the buildings, fire safety plan, exterior finishes, and exterior design views from all sides.
- AU has not planned the East Campus site for fire trucks to respond to fire emergencies in the residential facilities planned for the site. AU should be required to plan a fire lane – preferably adjacent to the 120-foot buffer – to add even a slightly larger distance between any buildings on the site and the neighboring homes at Westover Place. Moreover, AU should be required to consult with the DC Fire Department on the plan and get clearance on its safety. The 120-foot buffer should be landscaped so that it prevents vehicular and cut-through pedestrian traffic along full boundary with Westover Place.
- Meeting space on the East Campus should either be eliminated or located underground to minimize the visual and noise impact on neighbors for this use of the site.
- Although 4-story dorms may be located on Nebraska Avenue, no building should be built on the East Campus site visible to neighbors' property that is higher than the town homes at Westover Place with a minimum 120-foot buffer.
- Creating a “residence community” on the East Campus site may be incompatible with AU’s goal of locating a signature building on the site at some later date that will represent a prestige-building at Ward Circle to complement the existing Katzen Arts Center.
- Any housing on the East Campus site should be used only by juniors and seniors because of its proximity to residential property at Westover Place and in Wesley Heights – with the assumption and expectation that older students will be more mature.
- Any dorms built on the East Campus should be routinely patrolled by AU Campus Security – both the grounds of the site as well as the interior of the dorms – and AU should be required to provide reports to neighbors on a quarterly basis on its patrolling activities.
- Approval of the East Campus site should be conditioned on the approval of a construction management plan ratified both by AU and the Westover Place townhome community.
- AU should be required to revise its plans for the East Campus to include outdoor recreational space for student-residents living on the site and take other steps – in consultation with neighboring residents – to prevent use of the Horace Mann recreational space by AU students in order to preserve a quality neighborhood amenity for neighborhood residents and their young children.
- Windows from a 24-hour exercise facility on East Campus should not face Westover Place.

South Hall Housing Conditions

- The South Hall dorm should not be approved because of its location on the highest point of the campus. It seems geographically impossible to mitigate the impact of residents' objections.

North Hall Housing Conditions

- AU has failed to mitigate neighbors' objections to the proposed North Hall. Although construction at the North Hall site is acceptable in principle, the building's size should be reduced significantly – at least in half – and designed in a way to minimize visual impacts on Massachusetts Avenue, respect existing topography, and be in scale with the

President's House. As part of the Further Processing of the site, AU should be required to consult closely with neighbors – using an architecture-trained mediator, if necessary – to devise a plan that respects the views from Massachusetts Avenue and the tradition and significance of the President's House.

Nebraska Hall

ANC 3D has no objections to the expansion of Nebraska Hall to add 120 housing beds and applauds AU for its willingness to fully engage the Ft. Gaines neighbors and address their concerns.

ANC 3D also finds that the Further Processing request of AU for the East Campus site, as now planned, will tend to affect adversely the use of neighboring property and is not in harmony with the general purpose and intent of the Zoning regulations and maps; and opposes AU's request for Further Processing for the East Campus.

Approved 7-2 (Jones, Thomas opposed)

Traffic and Parking

ANC 3D finds for the reasons stated in its Summary report (Draft) that AU's campus plan and AU's Further Processing request for East Campus are both likely to cause objectionable conditions relating to traffic. ANC 3D calls on DDOT to identify a comprehensive solution to traffic problems in Ward Circle stemming from proposed expansion plans at AU and the Nebraska Avenue Complex (NAC) federal facility. The Office of Planning (OP) and the District Department of Transportation (DDOT) should consider the combined impact of the NAC and AU expansion proposals when assessing the AU Campus Plan even if this means delaying AU's expansion plans until effective strategies are in place to mitigate these negative impacts.

The proposed surface parking lot on the East Campus site should be eliminated and transformed into green space as a landscaped buffer with the neighborhood eliminating the Massachusetts Avenue ingress/egress point even for the underground parking garage and cut-through pedestrian traffic, as proposed by AU. DDOT should work with AU to require the university to bear some direct costs for traffic mitigation, including requiring AU staff to stagger their time of arrival and departure outside specifically-designed peak travel hours and requiring AU to sponsor and pay for installation of at least two Capital Bike Share stations on campus as their contribution to mitigating traffic as a condition of approval by the Zoning Commission of this campus plan. AU shuttle buses should be required to access and depart the campus through the Glover Gate removing all shuttles from Nebraska Avenue between Ward Circle and Rockwood Parkway. The Fletcher Gate should be closed to shuttle bus traffic upon approval of this campus plan and existing WMATA bus stops along Nebraska Avenue should be retained at their current locations.

AU should be required to enter into a meaningful dialogue with residents to address parking-related problems, including identifying a numerical range of parking spaces to be retained throughout the life of the 2011 campus plan and improving the efficacy of the Good Neighbor parking enforcement program.

It is also the sense of ANC 3D that the Zoning Commission should require AU to address pedestrian traffic mitigation strategies, including but not limited to examining whether building a tunnel or bridge, are viable options to ease traffic congestion in the Ward Circle area.

Approved 8-1 (Heuer opposed)

Other Building Projects

ANC 3D supports the following building projects as proposed by AU: the Mary Graydon Center, the Washington College of Law, the Kay Spiritual Center Addition, and the Butler Tunnel Enclosure.

ANC 3D supports the following building projects with conditions: the Beeghly addition with a condition that the gsf be reduced from 60,000 gsf to 50,000 gsf and that the addition be no higher than the existing building and that AU be required to show how the addition will be shielded from residents' views as part of Further Processing; the Multisports Gymnasium with a condition that the gsf be reduced from 25,000 gsf to 15,000 gsf, the building facades not be objectionable to residents, and that the building be no higher than 24 feet; the Sports Center Annex with a condition that the building be reduced in size to 24,000 gsf be no higher than 24 feet; East Campus Building 5 with a condition that the building be no higher than 54 feet and not include any retail.

ANC 3D opposes construction of the Reeves Field Bleachers based upon ANC 3D's findings, as set forth in the Summary Report (Draft), that those proposals are likely to create objectionable conditions that have been mitigated effectively by the university.

Approved 6-3 (Jones, Wells, Thomas opposed)

Student Behavior: Neighborhood Action Plan

In 2001, the Zoning Commission required AU to implement a "Neighborhood Action Program" to address off-campus conduct by students living in neighborhoods adjacent to the campus as a condition of approval of the campus plan. Under the terms of this condition, AU was required "to seek to charge students under its Student Code of Conduct" for bad behavior off campus. When problem houses have been identified by residents in recent years, AU officials have not been vigilant in responding to residents' concerns. Often, the problems continue for the academic year and are only solved when the tenants move to another location or graduate. The issue is not one that relates solely to students living off campus as the activities at these houses are a magnet for students living on campus resulting in major disruptions for residents throughout the community, not just those living nearby the offending houses. AU's Neighborhood Action Plan is ineffective and inadequate in protecting the neighborhood from disruptive student behavior off campus. ANC 3D supports the inclusion of a modified Neighborhood Action Plan in the 2011 AU Campus Plan that is the outcome of meaningful dialogue with residents with a goal of making the program more responsive to the needs of residents living near the campus.

Approved 7-2 (Jones, Wells opposed)

AU Acquisition Of Residential and Commercial Property

ANC 3D supports a condition to the 2011 AU Campus Plan that any further acquisitions of property by AU for university purposes in zip codes 20007 and 20016 should be treated as functionally equivalent to an amendment to the campus plan requiring approval by the Zoning Commission. AU will be required as a condition of the 2011 campus plan, to maintain all single

family residential property it owns as single family residences and agree not to rent these single family homes as group homes to students, for use by a fraternity or sorority, or as university faculty meeting centers.

Approved 9-0

Other Conditions

Conference Use of University Facilities

ANC 3D suggests the following language be added as part of the condition proposed by AU in the 2011 Campus Plan: The East Campus shall not be used for conferences and meetings, including space designated for residential facilities and meeting or other undesignated “activity” space. AU housing on the East Campus should be used solely for university student housing and not for use by outside organizations.

Approved 5-4 (Jones, Wells, Thomas, Heuer opposed)

Notification To DDOH, EPA, and Corps of Engineers

ANC 3D proposes that AU update this condition to require notification of the DC Department of the Environment (DDOE) when it files a permit application for ground clearance, excavation, or other major construction that would implicate remedial work performed at or around the campus by the U.S. Army Corps of Engineers instead of the DC Department of Health (DDOH).

Approved 9-0

Campus Lighting Plan:

AU shall include a Campus Lighting Plan as part of the 2011 Campus Plan identical to the plan approved by the Zoning Commission in the 2001 Campus Plan which states:

- All new outdoor lighting fixtures shall be designed, located, and installed so as to avoid the extension of spotlights beyond the boundaries of the campus;
- All lighting fixtures installed inside new campus buildings shall be equipped with motion sensors that turn the lights off when not in use, except for lighting fixtures installed in common areas or in other locations where constant lighting is needed for security or other reasons.
- Spotlights and outdoor lighting, both new and existing, shall be directed inward, downward, and away from the campus perimeter, and shielded when necessary to avoid lighting on the outside of the perimeter, to avoid objectionable impacts on neighboring property;
- Energy efficient lighting shall be used to illuminate roadways, parking lots, pedestrian walkways, and building exits, in order to achieve legitimate security requirements. Such lighting shall be shielded to prevent spotlights from extending beyond the campus boundary.
- Additional landscape screening shall be installed along the west elevation of the Watkins Building to further buffer those views.

Approved 9-0

Landscaping and Storm water Management Plan

AU must be required to consult closely with neighbors in the development of a Landscape Plan to address screening needs and the upgrading of plantings, especially along the campus periphery, including the East Campus, and a storm water management plan. The Landscaping Plan and the Storm water Management Plan should be incorporated as conditions of the 2011 Campus Plan.

Approved 9-0

Alcohol License Voluntary Agreement

AU will be required to engage the community in a dialogue concerning locations for alcohol service on campus with a goal of limiting alcohol service to 6-8 buildings and that this language should be included as a condition of the 2011 Campus Plan.

Approved 6-3 (Jones, Wells, Heuer opposed)

Outdoor Advertising

ANC 3D calls on the Zoning Commission to impose limits on AU that would prevent it from displaying electronic, digital, or other forms of outdoor advertising on buildings that front on Massachusetts, Nebraska, and New Mexico Avenues corridor.

Approved 6-3 (Jones, Wells, Thomas opposed)

Fletcher Gate

Consistent with its 1987 agreement with the Spring Valley community, AU will agree to take steps to discourage vehicles from turning right at the Fletcher Gate onto Rockwood Parkway and into the Spring Valley community, including installing a no right turn sign at the Fletcher Gate and creating a directional curb that obstructs right hand turns from the campus to Rockwood Parkway.

Approved 9-0

1.

Attachment D

Current Complaints: AU Student Off-Campus Behavior

NOTES

**RE: FEBRUARY 10, 2011 NEIGHBORHOOD MEETING
5007 YUMA STREET, NW**

ATTENDEES:

HOMEOWNER OF 5007: CAROL BEACH

AU: MIKE McNAIR, MICHELLE ESPINOSA, PENNY PAGANO, CURTIS BURRILL

**NEIGHBORS: CINDY & MERRILL YAVINSKY, TYRRELL FLAWN, RUTH & MARK KNOUSE, CINDY KACHER, CHARLOTTE LeGATES, HARRY DEMAMATIS, AMBLER CUSICK and ERASMO GONZALES-HOLMAN
(UNABLE TO ATTEND: EMILY & TOM GROSSI, CHRIS HARRISON and HAMID ESFANDIARY)**

Following introductions, each neighbor provided their experiences with the occupants of 5007 Yuma over the past 3 years. A summary of the comments would be the boys have shown a growing lack of respect for the neighbors and the neighborhood, the parties are larger, louder and longer, and trash in the street, alley and yard are a welcome wagon for rats, etc. We also learned that neighbors were threatened by the boys when approached to move cars from the Homeowners' private property or to quiet down. A couple houses have been egged.

Carol Beach responded that she did not know how terrible the situation was until recently and she did apologize to the neighbors. Carol has a lawyer who she says will draw up a 30 day notice of breach of tenancy which will be served each lessee. She indicated the notice will contain a number of restrictions on the tenant including the number of people allowed on the property at any time, timing of parties, etc. Carol did indicate there were 8 boys living in the house which is a violation of DC code (maximum of 5 unrelated persons in anyone SF dwelling). The notice will have an acknowledgement that they have violated the lease and the lease can be terminated if restrictions are violated.

Carol said her lawyer was unaware that she was not obligated to renew a lease where any of the lessees changed; the lease term ends June 30, 2011.

Chief McNair said the most important thing we can do is call his office first (**PREFERRED NUMBER 202-885-2527**). He will react much quicker than calling 911; and he will inform 911/ local police of the call. He added that there has not been many calls to his office over the years and that must change if we want this resolved.

McNair added that a DC law became effective February 1, 2011 prohibiting noisy parties between 10 PM and 7 AM. He also commented that his group was successful

in a similar situation on Ellicott Street and had the student tenants evicted (may have been no lease renewed).

Michelle Espinosa said she had met with the 8 occupants of 5007 on Tuesday and Wednesday of this week to discuss their action. Seven of the eight occupants are members of Pi Kappa Alpha (there are 40 AU members of the fraternity). She indicated a huge attitude problem and general lack of cooperation. Her office has met with Evan Kaplan, the local chapter advisor, and is in contact with the national fraternity office. The attitude is "nothing can be done to them" but Michelle feels that imposing restrictions on fraternity activities at AU will help. She also stated that the fraternity has several AU Code of Conduct violations.

Michelle has also clarified her discussion of the online form to record a complaint with the Dean of Students. The online steps are:

1. go to the AU website <http://american.edu>
2. click "quick links" on right side
3. click "AU in the Neighborhood"; takes you to Community Relations page
4. on left side, click on "community information"
5. on left hand navigation menu, click on "AU Neighbor Resources"
6. click on "AU Neighborhood Mailbox" in the middle of the page in the "AU Can Help" section. Takes you to the form

Michelle admits they are working to make the form more accessible, BUT NOT AS COMPLICATED AS IT SOUNDS!!!!!! Please use this Form if you wish to document the phone call you have already made-MAKE THE PHONE CALL TO CHIEF MCNAIR FIRST.

CONCLUSION:

2. each neighbor MUST call Chief McNair's office when any violations. Don't depend on another person to call; the more, the better. Remember the new 10 PM noise curfew, 7 days/week
2. be sure to also call Chief McNair for those noise, language laden daytime parties which will begin as weather warms.
3. Carol Beach indicates she will share with us the document her lawyer draws up. Yavinsky will follow up if no word in the next week or so.
4. Good first meeting. Hope for the best!!!

Attachment E

Response By AU To Off-Campus Student Behavior

Subj: **AU Resolution**
Date: 2/21/2007 12:44:33 PM Eastern Standard Time
From: tmfsmith@starpower.net
To: rachelwtoo@gmail.com
CC: ahaas212@comcast.net; aheuer3344@earthlink.net; ahg71139@aol.com; rachelwtoo@aol.com; wellsteone@aol.com; tmfsmith@starpower.net; EBSandza@LLGM.com; ANC3D@hotmail.com
Sent from the Internet (Details)

Rachel,

Let me apologize to you (and my fellow ANC Commissioners) in advance for the length of this e-mail. However, I wanted to be as comprehensive as reasonable given the concerns you have subsequently raised following discussions and actions related to American University at our last ANC meeting on February 7. These concerns warrant a thoughtful response.

You have asked for "evidence" to support the 6th paragraph of a resolution that the ANC already approved by a unanimous vote at the February 7 meeting concerning American University's (Case No. 06-43) request for a special exception to add floor space to the McKinley Building. As approved, the 6th paragraph of the resolution reads as follows:

"Whereas, the American University's Neighborhood Action Program has failed to address serious and ongoing neighborhood disturbances, reported by residents, and, perhaps, even illegal activities, among students living off-campus in individual and group rental units as well as fraternity houses located in the neighborhoods in violation of DC's zoning regulations; "

Specifically, you raised questions and asked for evidence to document three phrases in the resolution:

- "serious and ongoing;"
- "perhaps illegal;" and
- "violations of DC's zoning regulations.

You also have subsequently complained that there was insufficient detail provided at the meeting about the problem. So, this e-mail will include (a) some additional background on the problem; (b) the justification for the language you have questioned; and (c) copies of additional e-mail communications (listed as addendums) that you and/or other Commissioners might find helpful.

Additional Background

As you know and as we discussed at our January 10 and February 7 ANC meetings, American University is required in accordance with Zoning Commission Order No. 949-B to have in place a Neighborhood Action Plan (e.g. an established protocol) to address and resolve off-campus student behavioral problems occurring in neighborhoods surrounding the campus. This is a condition for approval of any special exception to the Campus Plan as is now being requested by the University (Case No. 06-43) to move ahead with its renovation and rebuilding of the McKinley Building.

Off campus student disturbances have been a problem in ANC 3D-02 in recent years, particularly during the spring and summer months as students host outdoor parties with live bands that

play far into the early morning hours. Neighbors often have complained to the police who "shut" the party down only for the party to start again once the police have left. Residents have been frustrated that AU did not respond faster or more effectively in dealing with this situation despite efforts to engage the university. As you may recall, David Taylor, AU's Chief of Staff for the Office of the President, made specific reference to this situation in ANC 3D-02 at our February 7 meeting. As you know, 3D-02 includes part of the university campus in its borders.

However recently, several residents, including ANC 3F Commissioner Cathy Wiss, have informed me about a similar problem near the Tenley campus that further demonstrates the absence of a protocol and a need for the university to be more responsive to neighborhood concerns associated with off-campus student behavior.

In particular, neighbors have complained about problems at 3908 and 3909 Windom Place NW. I have come to learn that 3908 Windom is a fraternity house located off campus. I have received complaints from Mr. John Cannon, 3905 Windom Place, and Ms. Patty Mason, 3902 Windom Place. Mr. Cannon reports (See Addendum # 1) that these problems have been going on since he bought his house more than ten years ago. Ms. Mason reports (See Addendum # 3) the problems have been going on for seven years. I have discussed the concerns directly with ANC Commissioner Cathy Wiss who represents this SMD. We have had numerous discussions about the issues, including examining related zoning issues. (As an FYI, I also have sought advice on this issue from ANC 3C Commissioner Nancy MacWood.)

In addition to raising the issue at our January 10 ANC meeting, I discussed the issue directly with Mr. Taylor again at a meeting I had with him on January 18. Mr. Taylor indicated no knowledge of the problem and indicated there was little the university could do to control off-campus student behavior. He reported the university is unable to track students living off-campus - that they are, in effect, outside the university's jurisdiction.

Just a few days after this meeting, neighbors reported again a series of loud and disruptive parties taking place on Saturday, January 20. Consequently, I raised the issue again on January 25 at the quarterly meeting of the Neighborhood Liaison Committee. At that time, Mr. Taylor informed me that AU staff had learned for the first time that 3908 Windom was a fraternity house and that they had addressed the problem. In a conversation that evening with Ms. Sara Waldron, the Associate Dean of Students, she assured me the issue had been addressed. I reported these conversations to Ms. Wiss, who then reported back to concerned residents.

However, Ms. Mason sent me an e-mail on February 5 outlining yet another difficult weekend stemming from another party at the same frat house property - this time after the university reported that it had already addressed and corrected the problem.

Both Mr. Cannon and Ms. Mason write quite eloquently about their frustration in dealing with American University. I have asked the university on several occasions - the latest being at our February 7 meeting - for the protocol (e.g. Neighborhood Action Plan) that they use to deal with such disturbances - and they have responded with only general comments. In other correspondence with Mr. Taylor, he has stressed that neighbors must take the initiative to bring the issue to the attention of the landlords (See Addendum #2 and #4) rather than relying on the university to intervene and correct the behaviors.

After the February 7 ANC meeting, I had a discussion with an AU student who attended our meeting. She lives at the Tenley campus and told me (and others standing nearby) that the houses in question were well-known and notorious on campus for underage drinking and recreational drug use.

She reported attending one party and indicated she would never attend another because the parties were so extreme that she feared for her safety.

Justification For Language In Paragraph 6 Of Approved Resolution

As for documenting the language in the ANC resolution:

"serious and ongoing" - The problems identified by Mr. Cannon and Ms. Mason that have been brought to my attention with the help of Commissioner Wiss document:

- the nature of the disturbances involving late night parties and disruptions by the students;
- the period of time over which such disturbances have been the routine rather than the exception; and
- the university's failed response to stem the problems over that span, even as recently as early February.

This seems sufficient to suggest that this is a problem that is both quite «serious and ongoing.»

"perhaps illegal:" - Ms. Mason's letter specifically makes reference to underage drinking. If true, this would be illegal; but note, we have qualified this by using the word "perhaps" so as to characterize this as an allegation. Also please note the reference in Ms. Mason's letter in which she reports witnessing that police have written citations to the students for holding a "loud party" consistent with this being an illegal activity.

"violations of DC's zoning regulations" - The houses in question are in a R-IB zone. As I understand, fraternity houses are not allowed as a matter of right in zoning districts that are more restrictive than R-4. Section 330.5 (g) which applies to R-4 zoning is the first time that fraternity houses are mentioned as a matter of right.

Summary

Although Windom Place falls outside our ANC, these are problems that have in the past and could again fall within my SMD and other ANC 3D SMDs that are directly adjacent to the university campus. As this situation demonstrates, AU lacks a protocol for dealing with such disturbances. Moreover, as e-mail correspondence with university staff demonstrates, AU is not above "passing the buck" to the police or to the residents instead of taking the initiative to address the problem without requiring neighbors to complain persistently over time.

As a result of the university's request for a special exception to rebuild McKinley, we have learned more about the university's on campus housing plans that could prompt even more students to move into surrounding neighborhoods in the coming years. By raising this issue now as part of Case No. 06-43, we help to put the university on notice that neighbors expect AU to take ownership of the problems concerning off-campus student behavior.

Copies Of Related E-Mail Communications

Addendum #1

Letter About Off-Campus Student Behavior From Mr. John Cannon, 3905 Windom Place As Forwarded By ANC Commissioner Cathy Wiss (Note: Mr. Cannon makes references to problems

associated with DC police handling of such complaints that are raised by AU's Sara 'Valdron, Associate Dean Of Students.)

Tom,

Here is the message I received. Saturday night around here was unbelievable where I live on Albemarle Street, which is about 4 blocks away. Throughout the night we heard wild yelling in the street. At around 2:30 am, I looked out and saw several young men standing around a car stopped in the middle of Albemarle Street and yelling. As the car rolled down the street, they walked along with it, continuing to yell. I have no idea whether they were AU students, but from time to time we have had similar incidents with students going to/from a group house at 38th and Albemarle.

Thanks for passing the message along.

Cathy

jcanon@rcn.com>
To: <schumannwiss@juno.com>
Cc: Patt.Reinert@chron.com, <Waldron@american.edu>
Date: Sun, 21 Jan 2007 11:29:52 -0500
Subject: AU students
Message-ID: <020e01c73d79\$6109ae30\$a50c3ad0@johnb14xprrolw>

Ms Wiss,

I am writing to appeal to you for help. I live at 3905 Windom Place, NW. I have lived here in the house I purchased since August of 1995. In the time I have lived here I have endured scores of nights of drunken screeches and howls and bellows from AU students attending parties on my block at the houses rented by students. In 2000, I was brutally assaulted by about six drunk students on the sidewalk in front of my house. I have had about all I can stand, and am ready to sell my house and move out of a neighborhood that I otherwise love. Last night was another of those nights.

The current situation on this block involves two houses. 3909 Windom place houses the traditional group of five students who periodically have huge parties, with no regard for the neighbors. The police have been called many times to stop the noise. I don't know if the police have been issuing citations and fines, but if they don't the kids will never learn.

The second situation on the block is more difficult to deal with. Apparently, the house at 3908 Windom Place is occupied by an AU fraternity. The people who control the house are obviously very concerned about not creating problems in the neighborhood. They keep everyone inside and usually, but not always, keep their guests from gathering on the front porch and making noise. The problem with this house is that they regularly have parties. These parties last until three or four AM. People are coming and going to these parties throughout the night. These people, arriving and leaving, make a lot of noise. I am therefore awakened constantly throughout the night by yelping, howling, laughing, loud talk, slamming doors, and generally animated conversation. It is like living on 18th St. in Adams Morgan. By the way, it is just unconscionable to me that the City would allow a fraternity to operate in a residential neighborhood.

Because the fraternity does not have groups of people hanging out, making it easy for the police to visually determine that there is a problem, and because the offending people are on the street for just a few minutes at a time, calling the police does not seem to be a solution. They would likely arrive to an apparently quiet house. How does one deal with this situation? I have contacted the person at AU responsible for dealing with complaints about students, Sara Waldron. She was not helpful, blaming the police and expecting that I would do her footwork. When I was assaulted by AU students, the people at AU took no interest.

It seems to me that AU and other DC universities should have responsibility for housing their students. They are operating a business that requires the presence of the students. They are benefitting from bringing the student to the city. Yet they are avoiding the capital and operating costs associated with providing student housing and

thereby placing the burden of the housing on the community. But, along with the cost of housing is the cost of having these people in the neighborhoods. They are typically transient and uninterested in becoming a part of the neighborhood, they are typically negligent in the upkeep of the property, they are frequently noisy and inconsiderate of neighbors, and they frequently create a public nuisance. This affects the quality of life and property values of those who are unfortunate enough to live in the same area as the rental houses they occupy.

What these universities do is similar to what an industrial polluter does. The industrial polluter avoids the capital cost of installing means to reduce or capture their waste by sending its pollution into the surrounding environment. The rest of society suffers while the owners of the polluting company receive the benefits of avoiding the cost of responsible waste management. So too, the university avoids the cost of housing its students, placing the burden and the cost on the surrounding neighborhoods. I am experiencing real suffering as a direct result of the failure of AU to keep its students on campus, while AU benefits by causing my suffering.

If the university is unable to provide sufficient housing for its students, requiring them to seek housing in the neighborhoods, then the university should impose very strict behavior standards on those students. If the university is unwilling to impose such standards, then the government needs to step in and force them to do so. I know this is a problem in neighborhoods surrounding all of the universities in DC. Through a friend of mine who works at AU, I made a number of suggestions to Ms Waldron. These suggestions are not prescriptive. I just want the university to take action and be responsible citizens of the community, instead of a scourge.

Suggestions:

1. Make this behavior an offense punishable by suspension and expulsion after X offenses.
2. Have campus people on call and **available** for quick response to go to the offending house at the time of the offending behavior. This allows first hand documentation by the school, and delivers an unmistakable message to the students that this behavior is not tolerated.
3. Provide an easily accessed place on the school web site for the reporting of offending behavior.
4. Conduct outreach to the community, at least where there are known concentrations of student housing. Make certain that the neighbors are informed of the school policies regarding this behavior, and what the neighbors can do for relief.
5. Follow-up with the neighbors after complaints reach some threshold. to keep them informed of what action the school is taking

These are relatively simple steps. Compared to the cost of developing student housing, they are very cheap. The schools owe it to the communities to be proactive about stopping this behavior.

Below is a response from Sara Waldron, Associate Dean of Students. Apparently, there is a problem in getting information from the police. So the police are allegedly standing in the way of getting a resolution to the problem. Actually, that just sounds like an excuse to me, not the real problem. Further, she expects the offended party to gather the names of the students. Don't they have an index of student names and addresses? Again, I see a lack of interest in helping.

Anything you can do to help would be appreciated. I am ready to move to Maryland. I have copied my neighbor, Patty Reinert, whom you helped with another problem house on our block a couple of years ago. I expect that she will also be contacting you. She and her family actually suffer even more than I do from the fraternity, which is next door to them. I believe she has the name of the fraternity and the name of at least one of the students.

Best regards,

John Canon
 3905 Windom Place, NW
 Washington, DC 20016-2242
 202-362-3388
jcanon@ron.com

Letter from Sara Waldron:

Dear Mr. Canon,

Peggy Eskow forwarded me your email about the students in the neighborhood. Thank you for bringing this to our attention.

I am the person who speaks with neighbors, so please feel free to contact me in the future. I also speak with students about these situations.

You made some suggestions in your e-mail and I want to respond to those.

It is very difficult to hold students accountable through our judicial system for off campus behaviors without documentation from MPD. We have tried to get reports from MPD about citations or arrests that are made in the neighborhood. This has been unsuccessful. Montgomery County Police do provide us with the reports on our students. Our public safety officers also have no jurisdiction in the neighborhood. They can only respond off campus at the request of MPD. When that happens, they do go and assist on the scene.

I meet quarterly with ANC representatives with other officials from the university. In addition to updates on campus buildings and programs, I always talk about neighborhood issues and how we have responded to situations.

It is always helpful for us to have any names of the students in these houses. If that is not available, a contact for a landlord or property manager is helpful.

I am sorry that these students are misbehaving. It is certainly not behavior we condone and we do our best to educate students to be good neighbors.

Sincerely,

Sara Waldron

Sara Waldron
Associate Dean of Students
American University
4400 Massachusetts Ave.
Washington, DC 20016-8148
202-885-3300
waldron@american.edu
CIVITAS: a community of civil and responsible citizens

Addendum #2

January 23 Response From AU's David Taylor To Me In Reference To Mr. Cannon's Letter

Tom:

Thanks for forwarding the e-mail, Contact was made with the correct AU person, Associate Dean of Students, Sara Waldron (who is a very responsible person); I also forwarded the item to fraternity advisor Danny Kelley. We'll get an update from Sara as to additional information and from Danny, will try to determine any fraternity involvement. If a fraternity link can be established - the national organizations have helped us in past situations as an additional leverage point.

I did not see a reference to the landlord/home owner - nor any attempt by anyone to contact the landlord who ultimately, is responsible for tenant behavior. If the landlord is "absent," there must be a rental agency.

There are no "frat houses" on campus, but they do have offices, and frat members can get clustered together in the same residence hall/floor.

We will update you if we can determine additional info, and please do the same for us.

DT

Addendum #3

Letter From :Ms. Patty Mason Concerning Off-Campus Student Behavior (Note: this letter identifies problems reported by AU officials as being addressed and resolved.)

On Tue, 6 Feb 2007 09:52:31 -0500 Patty and Scott Mason

<mason451@starpower.net> writes:

> To: Cathy Wiss, ANC Commissioner
> Tom Smith, ANC Commissioner
> Sara Waldron, Associate Dean of Students, American
University
>
> From: Patty Reinert Mason
> 3902 Windom Place NW
>
> Re: Noise complaints on Windom Place NW
>
>
> Feb. 5,2007
>
> Dear Ms. Wiss, Mr. Smith and Ms. Waldron:
>
> I am writing to you regarding your ongoing correspondence with our
> neighbor on Windom Place, John Canon. I hope to add my voice to his,
>
> regarding the outrageous and unacceptable conduct of American
> University students, past and present, renting apartments on our
> block
> and contributing to many sleepless nights, much frustration, anger
> and
> yes, violence, in our otherwise happy neighborhood.
>
> My husband and I and our 2-year-old daughter live at 3902 Windom
> Place
> NW, a home we own and love, but which is sandwiched between two
> rental
> properties and is across the street from several others. Since
> moving
> into this neighborhood in January 2000, we have been working
> alongside
> Mr. Canon and other homeowners to address loud parties, trespassing,
>
> absentee or negligent landlords, litter and other problems, many of
>
> which are caused by AU students living in our midst.
>
> At first, we approached the students themselves, asking them to be
> good
> neighbors _ to be respectful of the fact that we need to sleep in
> our
> homes at night in order to get to work in the morning, to take their
>

> parties indoors and turn down the volume at a reasonable hour, to
> ask
> their guests to refrain from parking in or blocking access to our
> driveway, and to refrain from using the alley behind the 7-11_ or
> our
> front lawn as a restroom.
>
> We have urged them to clean up after their parties, and when they
> haven't, we have spent countless weekend mornings collecting the
> beer
> bottles, cans and plastic cups that litter the sidewalk and street.
>We
> have even talked with their parents on occasion, asking them to
> reinforce the concept that this is a residential neighborhood of
> working adults and families, not fraternity row.
>
> Over the past seven years, we have done this repeatedly, semester
> after
> semester, as some students move out and new students move in. But
> our
> neighborly attempts to change the behavior of these student renters
>
> unfortunately resulted in the incident Mr. Canon cited in his
> letters
> to you: When he asked students attending a particularly loud,
> obnoxious porch party to quiet down and stop throwing their beer
> bottles onto his property and into the street, he was attacked and
> badly beaten by several young people. The police were called and AU
>
> officials were contacted, but to my knowledge, this was never
> resolved
> to the satisfaction of Mr. Canon or the rest of the neighborhood.
>
> From this point on, for our own safety, most neighbors have
> retreated
> to their own homes, where we call the police _sometimes several
> times
> in one night, sometimes several times within the same month, to shut
>
> down parties at the same rental houses. Thankfully, the police do
> respond quickly and professionally, and I have witnessed the writing
> of
> citations. Usually when two or three police cars respond, dozens of
>
> drunken students, many of whom appear to be underage, flee the
> rental
> houses. Often, when the police leave, the students return and the
> parties resume.
>
> Who are we kidding here? A \$350 ticket for a loud party is nothing to a

> wealthy AU student. One student boasted to me that he simply went to
>
> court and contested the ticket and said it was dismissed because
> there
> was no one to testify against him. (We, of course, were never
> contacted
> about his court date or given the opportunity to participate, so I
> have
> no idea whether this actually happened.) Other student neighbors
> have
> told us that they expect a citation and just pass the hat at their
> parties to pay for it.
>
> And for some of these students, their party is apparently not
> considered successful until the police show up. I say this because
> when
> I turned on my office light one morning at 5 a.m. so I could call
> the
> police for a second time that night to shut down a loud party next
> door, I was greeted with the screaming chants of 75-100 people on
> the
> deck of 3900 Windom Place, drunkenly cheering "Noise violation!
> Noise
> violation!"
>
> A more recent incident occurred last Wednesday, Jan. 31. I finally
> called the police shortly after I am to complain about a loud party
> at
> 3908 Windom Place. This was after three hours of trying to sleep _
> and
> of repeatedly soothing my toddler back to sleep _ through the
> screaming, whooping, car-door slamming revelry of a constant stream
> of
> students, coming and going from a roaring party at the Phi Kappa
> Alpha
> fraternity next door.
>
> If you recall, this was less than one week after you informed Mr.
> Canon
> that AUs Greek advisor had visited this house and apparently felt
>
> reassured that the students there would halt this offensive
> behavior.
> Last night, these same fraternity members hosted a Super Bowl party
>
> with five kegs in the backyard and a loud crowd of young people
> inside,
> and this morning, as usual, beer cans and cups littered the front
> yard.
> It is very difficult for me to believe that AU is oblivious to this,

> especially considering the recent correspondence with Mr. Canon.
>
> Over the years, we have also tried to engage the landlords who rent
>to
> disruptive AU students, with limited success. (Ms. Wiss will recall
>
> this as she was instrumental in helping us to convince one landlord
>
> after four years of hell caused by her renters living nextdoor to us
>
> to evict her tenants and rent to more responsible adults.)
> Unfortunately, other landlords are absent or unable or unwilling to
>
> address these complaints.
>
> In the case of the house at 3908 Windom Place, the previous tenants,
>or
> the owner of the property or the management company supposedly
> overseeing it, allowed a homeless man with apparent mental illness
>to
> move into a small shed at the rear of the property, where he has
> been
> squatting. I'm not sure whether he is still living there, but that
> is
> another issue for another day. I only mention it because it speaks
>to
> the futility of neighbors trying to deal with the owners of these
> nuisance properties.
>
> I wholeheartedly support Mr. Canon's efforts to work through these
> issues with AU and with the city, and my husband and I both share
> his
> frustration at the apparent unwillingness of AU officials to address
>
> this once and for all. With all due respect to Ms. Waldron, I find
> it
> impossible to believe, for example, that AU has no way of knowing
> where
> its students are living or where its Greek organizations have set up
>
> house. Why is it up to the neighbors to investigate this and provide
>
> the university with the names of the offending students? What is
>AUs
> punishment for students who wreak havoc in the neighborhoods
> surrounding the university, sully the university's good name?
> This
> may be a world class educational institution, but I can tell you
> your
> students are far from classy when they are vomiting or urinating on my

> front steps in the middle of the night
>
> I really feel like the neighbors have done what we can to address
> this
> issue. Now it's AU's turn, and the city's turn. I would really
> appreciate a meaningful response.
>
> Patty Reinert Mason
> 3902 Windom Place NW
> Washington, DC 20016
> 202/537-0668
>mason451@starpower.net
>

Addendum #4

Response from AU's David Taylor to Me Concerning Ms. Mason's Letter

Tom:

I will ask campus life & AU counsel for a clearer explanation of when student conduct codes apply (and when not). They will likely be familiar with the situations that exist at neighboring universities as well.

As for the leaseholder/landlord - that is where the ultimate authority on tenant behavior rests. I know that Sara Waldron has contacted realty companies/landlords in the past (as have I), to ask them to please weigh in with their tenants. Because these are not campus houses and instead, are private residences - the tenants are governed by local laws (and not university housing regs).

The fraternity link can be helpful when indeed, residents might belong to a specific frat recognized by the university; that provides a stronger arm for the campus life/frat advisor; and if a nationally recognized chapter - that also can help. Not every organization is so sanctioned, however, which means one less leverage point for those that are not official organizations.

Again, I will ask that Sara Waldron/Campus Life provide a clearer explanation of what AU can (and will) do in this and any other similar situation. Meanwhile, Sara & Danny Kelley have a scheduled a meeting with house residents to review what you are reporting.

DT

Addendum #5

Correspondence Between ANC Commissioner Cathy Wiss and AU's Sara Waldron Along With Ms. Waldron's Response To Other Neighbors' Complaints

Thank you for working with the Greek leadership on this issue. I also request that AU decide how it will handle fraternities operating where they are prohibited by DC's zoning regulations. NO fraternity should be located in a low density residential zone like the one in which 3908 Windom Place is located or in any of the neighborhoods surrounding your campuses. I believe AU should adopt a clear and firm policy to shut down fraternities that violate local zoning and other regulations. Please let me know what course you decide to take.

Regards,
Cathy Wiss

Commissioner, ANC 3F06
202-966-1310

On Tue, 6 Feb 2007 15:44:13 -0500 Sara Waldron <Waldron@american.edu> writes:

Dear Mr. and Mrs. Scott,

I was disturbed to read your letter this morning detailing further issues with the men at 3908 Windom Pl. As you are aware, the advisor for that group met with them two weeks ago. I personally spoke with one of the men in the fraternity concerning these issues. Our coordinator of Greek life has already contacted the advisor and we are in the process of setting up a meeting with the advisor, the leadership of the fraternity, residents of the property and my office.

I have a training session this weekend with Greek leadership and will be addressing neighbor relations with them and will be referring to this situation. Again, I apologize for the irresponsible behaviors of these students.

Sincerely,

Sara Waldron

Sara Waldron
Associate Dean of Students
American University
4400 Massachusetts Ave.
Washington, DC 20016-8148
202-885-3300
waldron@american.edu
CIVITAS: a community of civil and responsible citizens

If you would like to discuss this further, please feel free to contact me.

tom smith

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Thursday, February 22, 2007 America Online: AHG71139

Attachment F
AU Off-Campus Parking

AMERICAN UNIVERSITY
Off-Campus Parking Enforcement
Citations Issued 2006-2009

	2006	2007	2008	2009
44th St	7	30	82	172
45TH St	129	115	176	343
46TH St	1	3	28	21
48TH St			7	51
Chain Bridge Rd	11			
Macomb St	45	44		4
Massachusetts Ave			16	163
Methodist Church	19	21	4	1
Newark St	7	28	4	22
Rockwood Parkway	137	91	149	217
University Ave	5	14	37	29
Warren St	1	25	16	22
Windom Pl			3	11
Other	35	22	55	53
Total	397	393	577	1,109

AMERICAN UNIVERSITY
Washington College of Law
Neighborhood Parking Enforcement
Citations Issued 2006-2009

	2006	2007	2008	2009
45TH STREET	106	105	172	110
46TH STREET	69	175	88	127
47TH STREET	133	234	167	100
48TH PLACE	38	162	136	217
48TH STREET	127	640	696	662
49TH STREET	93	383	259	274
50TH STREET	1	-	1	8
ALBERMARLE STREET	89	92	88	193
ALTON STREET	98	163	121	183
BRANDYWINE STREET	30	59	30	8
BUTTERWORTH STREET	30	35	88	10
FORDHAM ROAD	213	884	657	810
MASSACHUSETTS AVENUE	12	163	76	-
SEGEWICK STREET	-	-	17	49
SUPERFRESH LOT	-	24	3	106
TILDEN STREET	5	146	140	19
UPTON STREET	35	383	316	170
VAN NESS STREET	70	268	198	321
VERPLANK STREET	67	76	34	45
WARREN STREET	17	559	390	714
WINDOM STREET	280	223	104	221
YUMA STREET	143	484	93	163
NO STREET LISTED	811	505	51	27
Total	2,728	5,761	4,063	4,784

AMERICAN UNIVERSITY
Off-Campus Parking Enforcement
Citations Issued Law School
Academic Year 2010-2011

Street	Tickets Issued
Fordham Road	658
48th Street	702
Warren Street	629
49th Street	279
Yuma Street	275
Windom Place	269
47th Street	173
Van Ness Street	172
Albermarle Street	161
46th Street	122
Others	645
	<hr/>
	4265

AMERICAN UNIVERSITY
Off-Campus Parking Enforcement
Citations Issued Main and Tenley Campuses
Calendar Year 2010

Street	Tickets Issued
45TH St	474
Rockwood Parkway	381
Massachusetts Ave	218
Macomb St	127
Newark St	86
New Mexico Ave	76
Warren St	67
University Ave	54
44th St	50
Lowell St	33
All Other	463
Total	2029