**MEMORANDUM**

TO: District of Columbia Zoning Commission

FROM: Jennifer Steingasser, ^{JS} Deputy Director, Development Review and Historic Preservation

DATE: May 5, 2011

SUBJECT: Case No. **ZC-10-32:** Request for Special Exception approval of a new campus plan for Georgetown University, filed by Goulston & Storrs, P.C. for the President and Directors of Georgetown College

Universities are an important part of the District's intellectual and cultural life. They have the potential to contribute significantly to the local economy and employment. When located within residential zones, the impacts of a university must be evaluated against the standards of the zoning regulations and considered carefully to avoid adverse impacts to the residential communities that surround them. Student housing, student life activities, and academic and administrative operations must be provided and arranged to avoid adverse impacts on surrounding communities, with special attention paid to ensure that the quality of life of existing residential neighborhoods is not diminished. With conditions the Georgetown campus plan can facilitate the fulfillment of their academic mission and not be objectionable to neighboring property.

SUMMARY RECOMMENDATION

Georgetown University has applied pursuant to § 210 of the Zoning Regulations for special exception approval of a new campus plan for its main campus, located at 3700 'O' Street, N.W. for the years 2010 through 2020. The Office of Planning commends the efforts made by the University through their March 31, 2011 prehearing statement to increase housing by 2013, relocate 1000 students in the Graduate School of Continuing Studies (SCS) and maintain their currently approved parking inventory.

The Office of Planning recommends the 2010 Campus Plan be approved with the following conditions:

Undergraduate Enrollment:

1. The traditional undergraduate student (TUS) enrollment be capped at 6652¹ as proposed by the applicant in the application dated December 30, 2010 and the Pre-hearing Submission dated March 31, 2011;

Maximum Total Enrollment

1. Maximum total enrollment shall include TUS enrollment as capped and all other students taking a minimum of one class at the main campus regardless of program or status;
2. The maximum total enrollment on the main campus be capped at 12,959² for the 2011-2012 and 2012-2013 academic years
3. The maximum total enrollment on the main campus be capped at 13,432³ for the academic year 2013-2014
4. The maximum total enrollment on the main campus may thereafter be increased to 13,941 subject to any adjustment related to reduction in TUS cap

¹ Appendix L of the Dec. 30, 2010 Application Page 3 Sections V and VI.

² 12,959 equals the proposed cap of 6652 traditional undergraduates and the enrollment at the end of the 2010 Campus Plan of 4,485 graduate and 822 medical students as noted in Appendix L of the Application and 1,000 Continuing Studies/non-degree/2nd Degree Nursing students;

³ The increase represents a 7.5% annual increase after 2013; historic figures represent an estimated annual growth in graduate and non-traditional undergraduate growth since 2008 in a range of 6%-7%.

Campus Housing

1. University provide 250 new beds as proposed in the pre-hearing statement dated March 31, 2011 by the Fall semester of 2014
2. University housing be provided for 90% of the TUS enrollment by the Fall semester of 2015;
3. University housing be provided for 100% of the TUS enrollment by the Fall semester of 2016;
4. If housing is not provided for 100% of the TUS enrollment by the Fall of 2016, the TUS enrollment shall be reduced annually by 25% of the difference between the TUS enrollment and the number of university provided beds, until 100% of the TUS enrollment is housed in university provided housing approved as part of the Campus Plan, effective for the Fall of 2017 through the Fall of 2020;
5. The University may increase TUS enrollment up to the original cap after reductions are made only if additional Campus Plan approved student housing is available for each undergraduate to be enrolled up to the TUS enrollment cap;
6. The location of all University provided housing shall be approved by the Zoning Commission as part of the Campus Plan or amendment thereto and shall not be within zip code 20007 or east of the 37th St University gates;

Enrollment Calculation

1. Compliance with enrollment counts shall be calculated each semester and not calculated by averaging between semesters;

Medical Facilities

1. Further processing for the Medical Facilities (including MedStar Health) be limited to those identified as MHC-1 through MHC-4, MHC-6 and MHC-15 and that a more comprehensive plan for the Medical Facilities' growth be provided as an amendment to the 2010-2020 Campus Plan, including parking and traffic impacts.

Additional information

1. Additional information be provided regarding the duration and definition of "temporary employees, employees of contractors or other non-university owner or controlled entities" that would have staff or employees coming to the campus and their means of getting to and from the main campus.

Because the original application dated December 30, 2010 was modified by the pre-hearing statement dated March 31, 2011 and the OP reports refers to each for reference and citation, OP will refer to the original application filed on December 30, 2010 as the "Application" and the pre-hearing as the "Statement".

SITE DESCRIPTION

Location: 3700 'O' Street, N.W.

Legal Description: Square 1321, Lots 811, 815, 816, 821, 823 through 827;
Square 1222, Lots 62, 801 and 802;
Square 1223, Lots 62, parts of 65, 66 and 67, 86, 807, 808 through 810, 812, 815, 826, 827, 831, 834, 843, 846, 847, 852, 853, 855, 857 and 858;
Square 1226, Lots 94 through 101, 105 through 107, 803, 804, 811 through 815;
Square 1248, Lots 150 through 157, 160 through 162, 800 through 802, 894, 805, 829 through 831, 834 and 835;

Ward/ ANC: 2E

Zoning: R-3 and C-1

Acreage: 104 acres

The campus is located in the west side of Georgetown. It is generally bounded by Prospect Street, N.W. on the south, Glover-Archbold Park on the west, Reservoir Road on the north and the Cloisters condominium development and the Convent of Visitation on the east. On the east, south of P Street, the traditional portion of the campus is bounded by 37th Street but the full campus boundaries extend east to 36th Street and 35th Street, and includes square 1225 and 1222, and most of squares 1248 and 123. No changes to these campus boundaries are proposed.

Academic, administrative, athletic and dormitory buildings are primarily located on the southern two-thirds of the campus, with a medical complex occupying the north side. The medical complex includes research and academic facilities and a hospital operated by MedStar.

Vehicular access to the campus is from Canal Road, the primary access point. Access to the medical complex is from Reservoir Road and the Prospect Street access is for emergency and service vehicles. Campus roads permit internal circulation.

NEIGHBORHOOD CHARACTER

The campus is primarily surrounded by historic residential rowhouse communities including Burlieth and Hillendale to the north, West Georgetown to the east, and Foxhall just west of the adjacent Glover-Archbold Park. Office, retail, and eating, drinking and entertainment establishments are located to the west and south in the commercial corridors along M Street, NW and Wisconsin Avenue, NW. To the south is Canal Road and the Potomac River.

The adjacent West Georgetown neighborhood is part of the Georgetown Historic District established by Congress through the Old Georgetown Act in 1950. The district is a National Historic Landmark and the Old Georgetown Board of the U.S. Commission of Fine Arts reviews all plans for construction or alteration of any building within the district. West Georgetown is predominately characterized by historic, narrow lot, rowhouse structures that date back as early as the 1780's, on narrow grid streets that establish an intimate scale in contrast to the wider streets of the L'Enfant city grid. There are also some small apartment and single family buildings.

The vast majority of the rowhouses in West Georgetown between Reservoir Road, M Street and Wisconsin Avenue are residential homes that are directly attached to the neighboring houses and do not have garages or on-site parking access. Most of the homes share rear lot lines with their rear neighbors. Only 21 of the 35 residentially zoned squares in this area have even a partial alley and only seven (20%) have alleys that are continuous through the square. Thus the narrow neighborhood streets must accommodate the residents' private vehicle parking, service activities and trash collection.

The Burlieth neighborhood to the north of Reservoir Road is also characterized by narrow lot, rowhouse developments that date back to the 1920's. The area has a more uniform and connected alley system but the residential lots are uniformly narrow, ranging between 18 and 20 feet in width with a regular pattern of adjoining rowhouses from block to block with no interruption.

Both neighborhoods are densely developed rowhouse areas with typical heights of two to three stories and lot depths that typically range between 90 and 140 feet but it is not unusual to find lots as short as 50 feet. It is the historic "check to jowl" development pattern of single family rowhouse residences that defines the character of these neighborhoods and also makes the neighborhoods fragile with limited capacity to absorb adverse impacts such as noise, litter, parking or excessive traffic. Whereas a detached residential structure with side yards would have a built in horizontal separation and buffer, and a high rise residential building has a vertical separation, a rowhouse community has neither.

The Comprehensive Plan Future Land Use Map identifies the residential neighborhoods surrounding the University as moderate density residential to the east and low density residential to the north of the campus. The Comprehensive Plan Generalized Policy Map identifies all residential areas surrounding Georgetown University as Neighborhood Conservation Areas which anticipates that institutional uses will be developed at a moderate scale but also establishes an explicit “guiding philosophy” of “*conserving and enhancing neighborhoods within this category.*” This philosophy is expanded on throughout the Comprehensive Plan and is introduced in the Land Use Chapter with a statement:

The growth of private institutions has generated significant concern in many of the city’s neighborhoods. These concerns relate both to external impacts such as traffic and parking, and to broader concerns about the character of communities where institutions are concentrated or expanding. (§ 315.5)

The context of the adjacent neighborhoods’ historically narrow lots, intimately built structures, intermittent alley systems, and Comprehensive Plan designation are relevant to the discussion of the impact of number of students, noise, traffic, and the situation of the neighborhoods being at the tipping point of diminished residential character.

2000-2010 CAMPUS PLAN

The previous campus plan (2000-2010 Plan) expired on December 31, 2010. Under the 2000-2010 Plan:

- The Floor-Area-Ratio (FAR) of the campus was proposed to increase from 1.12 to 1.41, an increase of 382,381 square feet;
- The undergraduate population was approved to increase from 5,627 to 6,016.⁴ Which resulted in a decrease in the percent of undergraduates housed on campus decreased from 78 percent in 2000 to percent to 75.7 percent in 2010, despite the construction of the Southwest Quad dormitory in 2002 with 750 beds.
- Off-street parking spaces were approved at 4050, the same as the 1989 Plan
- The Southwest Quad dormitory was carried over from the 1989 plan as the only new dormitory in 20 years

Four further processing applications were approved under the 2000 Campus Plan. Those applications include:

1. ZC Case No. 02-32: Adopted November 12, 2003, this application permitted the construction of the Performing Arts Center.
2. ZC Case No. 05-6: Adopted June 13, 2005, this application included a campus plan amendment to permit the construction of an addition to the Bles Building, and further processing for the construction of a CyberKnife facility.
3. ZC Case No. 05-31: Adopted November 28, 2005, this application permitted the construction of a new McDonough School of Business and the Multi-Sports Facility.
4. ZC Case No. 07-23: Adopted October 22, 2007, this application included a campus plan amendment to permit an Athletic Training Facility, and further processing for the construction of the Athletic Training Facility, a new science center and modifications to the previously approved Multi-Sports Facility,

2010-2020 CAMPUS PLAN PROPOSAL

210 COLLEGES AND UNIVERSITIES (R-1)

- 210.1 Use as a college or university that is an academic institution of higher learning, including a college or university hospital, dormitory, fraternity, or sorority house proposed to be located on the campus of a

⁴ This number is equal to 6,675 utilizing the new method of counting students.

college or university, shall be permitted as a special exception in an R-1 District if approved by the Zoning Commission under § 3104, subject to the provisions of this section.

The subject application is a request for special exception approval of the 2010-2020 Campus Plan for Georgetown University in the R-3 District. A small portion of the campus, on the west side of 36th Street, between Prospect and P, is located within the C-1 district.

Section 3104 authorizes the granting of special exceptions, as provided in the Zoning Regulations, where, in the judgment of the Board of Zoning Adjustment or Zoning Commission, *"the special exceptions will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps and will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Map subject in each case to the special conditions specified in this title,..."*

The University is in the R-3 District and the surrounding communities are predominantly in the R-3 District. The intent of the R-3 zone district is set out in title 11 DCMR Chapter 3:

320.1 *The R-3 District is designed essentially for row dwellings, but there shall be included in R-3 District areas within which row dwellings are mingled with one-family detached dwellings, one-family semi-detached dwellings, and groups of three (3) or more row dwellings. To maintain a family-life environment, permitted related uses are the same in R-3 Districts as in R-1 Districts.*

210.2 *Use as a college or university shall be located so that it is not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions.*

The number of students, noise and traffic has created objectionable conditions to neighboring residential properties by reducing available on-street parking in a neighborhood with severely limited off-street parking and intermittent alley systems, noise, litter and public disturbances that resulted in an increase in 911 calls to the MPD.

Proposed Number of Students

Both the 12/30/10 Application and the 3/31/11 Statement propose to maintain a cap of undergraduate enrollment at 6,675 students which is equivalent to the approved number in the 2000 plan. The Application proposes a maximum total enrollment of 16,133 which is amended to 15,000 by fall 2013 in the pre-hearing Statement through a commitment to relocate 1000 graduate Continuing Studies students to a satellite campus location.

The proposed number of students in the 2010-2020 Plan represents a significantly increasing student body since the 1990 Campus Plan. Between 1990 and the end of the 2010 plan the undergraduates have increased by an estimated 11-22% (calculation varies because of change in counting methodology) and the other categories of students have increased by 242%.

Using the projected maximum total enrollment after Fall 2013, the growth of the students in the Georgetown University neighborhood will essentially be double the number of students (an increase is 98%) since the 1990 Campus Plan was approved.

	1990-2000	2000-2010	2010 – 2020 proposed	
Undergraduate Enrollment – Cap	5,417	6,016 ⁵ cap 6,652 ⁶	6,652 ⁷ cap	
Undergraduates Beds on Campus	Approx. 4,000	5,053	5,053 + 250	
Graduate /SCS Enrollment	2,160	7381	9,381 8,348	12/31/2011 12/13/2013
Total Enrollment	7,577	14,033	16,033	12/31/2011
			15,000	12/13/2013

Enrollment Growth of Total Maximum

Percent change between 1990-2000 and 2000-2010 = $(14033-7577)/7577 = 85.2\%$ increase

Percent change between 2000-2010 and 2010-2020 = $(15000-14033)/14033 = 6.9\%$ increase

Percent change between 1990-2000 and 2010-2020 = $(15000-7577)/7577 = 98\%$ increase

Enrollment Growth of Un-capped Students

Percent change between 1990-2000 and 2000-2010 = $(7381-2160)/2160 = 241.7\%$ increase

Percent change between 2000-2010 and 2010-2020 = $(8348-7381)/7381 = 13.1\%$ increase

Percent change between 1990-2000 and 2010-2020 = $(8348-2160)/2160 = 286.5\%$ increase

Undergraduate Cap: Proposed at 6652

OP is supportive of a clear and understandable student count and maintaining the proposed undergraduate cap. The applicant proposes that certain undergraduates should be excluded from the traditional undergraduate student cap, namely non-degree seeking students, students in the School of Continuing Studies (SCS) and second degree nursing students. The 12/30/10 Application cites these as representing 727 of the 7379 total 2010 undergraduates – roughly 10 %. The applicant states that these undergraduates are “unlikely” to pose an objectionable impact because these programs do not have an integral residential program.

OP appreciates the applicant’s acknowledgement that residency is likely to pose an objectionable impact and notes that residency is not the only impact. The unregulated growth of these non-traditional categories has impacts on the surrounding neighborhood in terms of parking and commuting, and there has been no evidence provided that these students do not socialize with other traditional students, participate in university related activities adding to noise and traffic.

These non-traditional students would be captured in the maximum total enrollment cap and OP recommends that regardless of what other classes a traditional undergraduate student may take, a traditional undergraduate student will always count in the undergraduate cap.

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- 5 Average number of full-time traditional undergraduate students enrolled in the fall & spring semesters. Excludes non-traditional students such as students in non-degree programs, students returning to school for a second undergraduate in nursing, veterans, students over 25, commuters and students studying abroad.
 - 6 Number of students based on 2010 counting methodology
 - 7 Includes all students enrolled in traditional undergraduate programs, whether full or part-time, including veterans, commuters, students over 25 and students studying abroad; Does not include non-traditional programs, such as non-degree students and students returning for their second degree in nursing.

OP is concerned that the maximum total enrollment of students – proposed in the prehearing Statement at a total of 15,000 by Fall of 2013, of which 6652 would be undergraduates- places the surrounding neighborhoods at the tipping point of diminished residential character. Off campus student living and commuting traffic add to the deterioration of the residential character of the surrounding neighborhoods. As stated above, the streets in this part of the City are narrower and the building type more intimate, thus noise, litter, public disturbances, parking, and traffic more immediately felt.

The applicant provided the Office of Planning with a list of the addresses of 2,334 Georgetown University students living in zip code 20007⁸. This data was mapped, as shown in Map 1, Location of Off-Campus Student Housing. As evidenced by this map, the heaviest concentrations of students are located within Burleith and West Georgetown neighborhoods, which is logical considering the proximity of these communities to the campus.

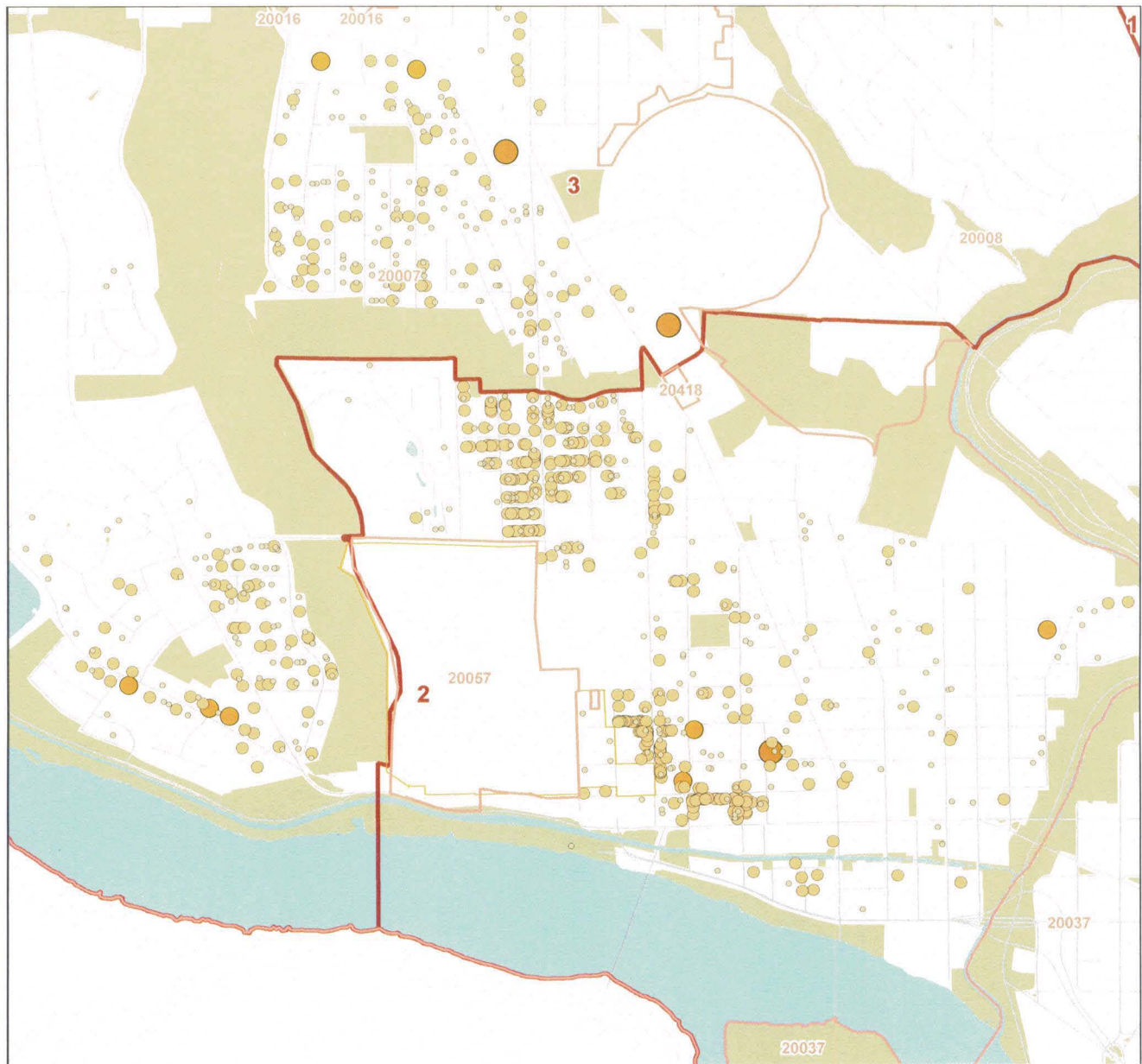
The citizens of Burleith and West Georgetown have indicated to the Office of Planning that their community has reached the tipping point, and that its historic residential character is now overshadowed by university student residency and behavior. Although there is no set definition of a tipping point, many of the squares surrounding the university have been inundated by student housing with percentages as high as 94% of a square and typically between 30-40%, OP agrees that Burleith's and West Georgetown's residential character is no longer balanced.

The number of students living within a community has an adverse impact due to the transient nature of students, their orientation to the university and university events, their involvement and socialization with other students and likelihood that they are not living year round within the community versus a full-time permanent resident who have chosen a community as their home. Averaging the count of the student caps over two semesters masks the full impacts of students. The numbers indicate a higher enrollment in the fall but there is no information provided about where the student lives or how the swing in enrollment adds to the transient nature of a residence if the student chooses not to enroll in a second semester.

To fully assess the number and impact of students OP recommends:

- Compliance with enrollment counts shall be calculated each semester and not calculated by averaging between semesters;

8 20007 is the zip code immediately surrounding the university to the east.



MAP 1: Location of Off-Campus Student Housing



Map 2 and Map 3 indicates the percentage of residential properties within squares located within Burleith and West Georgetown that had student residents. The addresses of students were obtained from the applicant for the fall of 2010, and location of the residential properties was obtained from the DC Office of Revenue and Taxation. Square numbers are in black; percentage of residential properties with the percent of properties in that square that house a Georgetown University student is in red. No data was included for Square 1296S due to the physical configuration of that square and the difficulty it presented in applying the data.

Residential units counted may be occupied entirely by students, or a mix of students and non-students. However, it does indicate how many of the residential units are affected. With percentages generally at one-third and higher up to 94 percent, it is understandable why this community has concluded it has reached the tipping point. On some blocks the number of residences occupied by students exceeds the number of permanent residents, unquestionably converting this community to a student neighborhood.

A study conducted by Dr. Richard Tyler concluded that when the student population exceeds twenty percent, or when the number of shared housing units exceeds ten percent of the properties, the neighborhood tipped and was no longer balanced.⁹

Map 4 overlays calls in 2010 to the Metropolitan Police Department (MPD) within the Burleith and West Georgetown neighborhoods and the addresses identified as student residences. There is a clear correlation between the aggregated volume of calls to the MPD and the areas of concentrated student residences.

This correlation is further borne out by detailed data provided by the Citizen Association of Georgetown (CAG). In response to a Freedom of Information Act request for data, MPD provided CAG with historical data from 2000 through 2010 of 911 calls by street block. While there is variation from year to year, the street blocks nearer the University with the higher concentration of student residences, have a consistently higher amount of 911 calls over the last ten year Campus Plan than the blocks that have fewer or no student residences.

O Street, NW has the highest concentration of student residences between 35th and 36th streets.

911 Calls from 2000 to 2010 on O ST NW by Street										
Year	37TH	36TH	35TH	34TH	33RD	31ST	30TH	29TH	28TH	27TH
2010	4	2	33	5	7	3	0	3	0	0
2009	4	2	54	0	6	6	4	2	0	0
2008	0	2	30	5	7	5	5	1	0	1
2007	0	0	60	7	5	4	4	2	2	3
2006	1	8	56	0	6	10	4	3	2	1
2005	1	8	61	5	3	4	4	5	3	4
2004	0	4	47	10	8	4	1	1	2	2
2003	0	2	50	14	10	6	3	2	0	2
2002	0	9	37	4	9	12	5	0	0	0
2001	0	3	22	6	12	5	1	1	0	0
2000	0	10	24	5	3	10	4	1	1	0

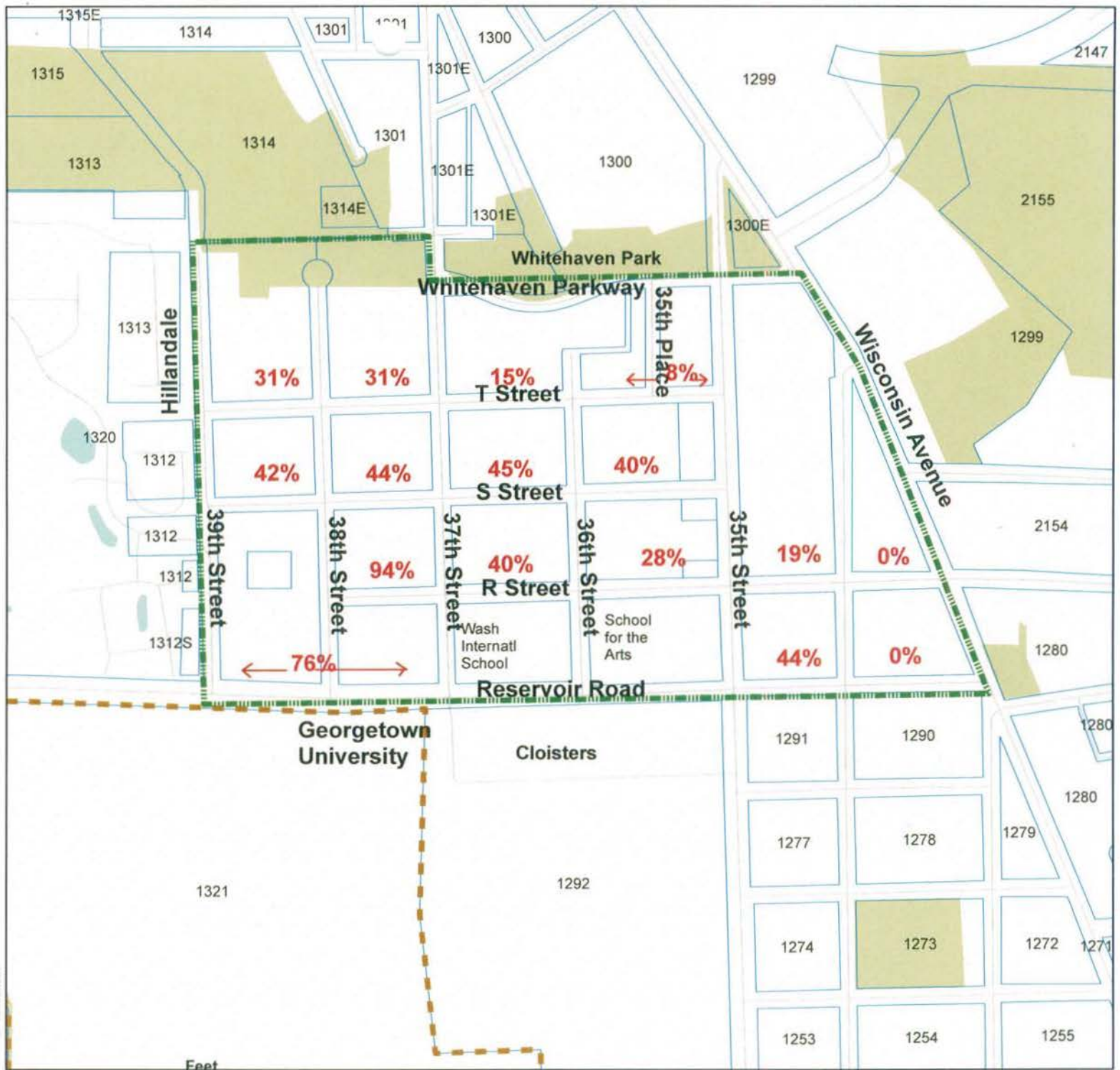
Provided by Citizen Association of Georgetown
Data Source: Metropolitan Police Department

Prospect Street, NW has the highest concentration of student residences between 33th and 34th streets.

⁹ "Balanced Communities & Studentification, Problems and Solutions," Dr. Richard Tyler, National HMO Lobby (United Kingdom, 2008, page 7.

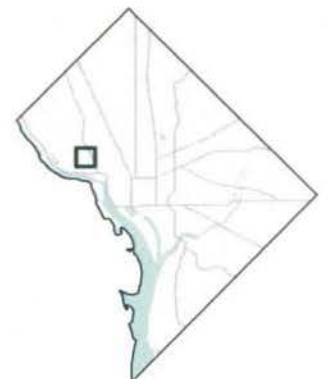
911 Calls from 2000 to 2010 on Prospect ST NW by Street										
Year	37TH	36TH	35TH	34TH	33RD	31ST	30TH	29TH	28TH	27TH
2010	0	3	1	6	27	0	0	0	0	0
2009	1	2	7	5	24	0	0	0	0	0
2008	0	3	3	5	67	0	0	0	0	0
2007	0	2	1	6	44	0	0	0	0	0
2006	1	4	4	10	38	0	0	0	0	0
2005	3	7	9	9	60	0	0	0	0	0
2004	0	8	1	10	87	0	0	0	0	0
2003	3	2	2	9	72	0	0	0	0	0
2002	1	5	6	10	27	0	0	0	0	0
2001	0	6	4	8	35	0	0	0	0	0
2000	0	6	5	6	19	0	0	0	0	0

Provided by Citizen Association of Georgetown
 Data Source: Metropolitan Police Department



Burleith

- College Campuses
- Property Squares
- Street Centerlines
- Water
- Parks

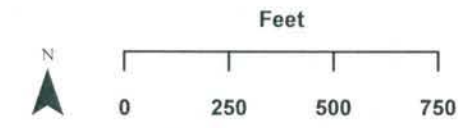
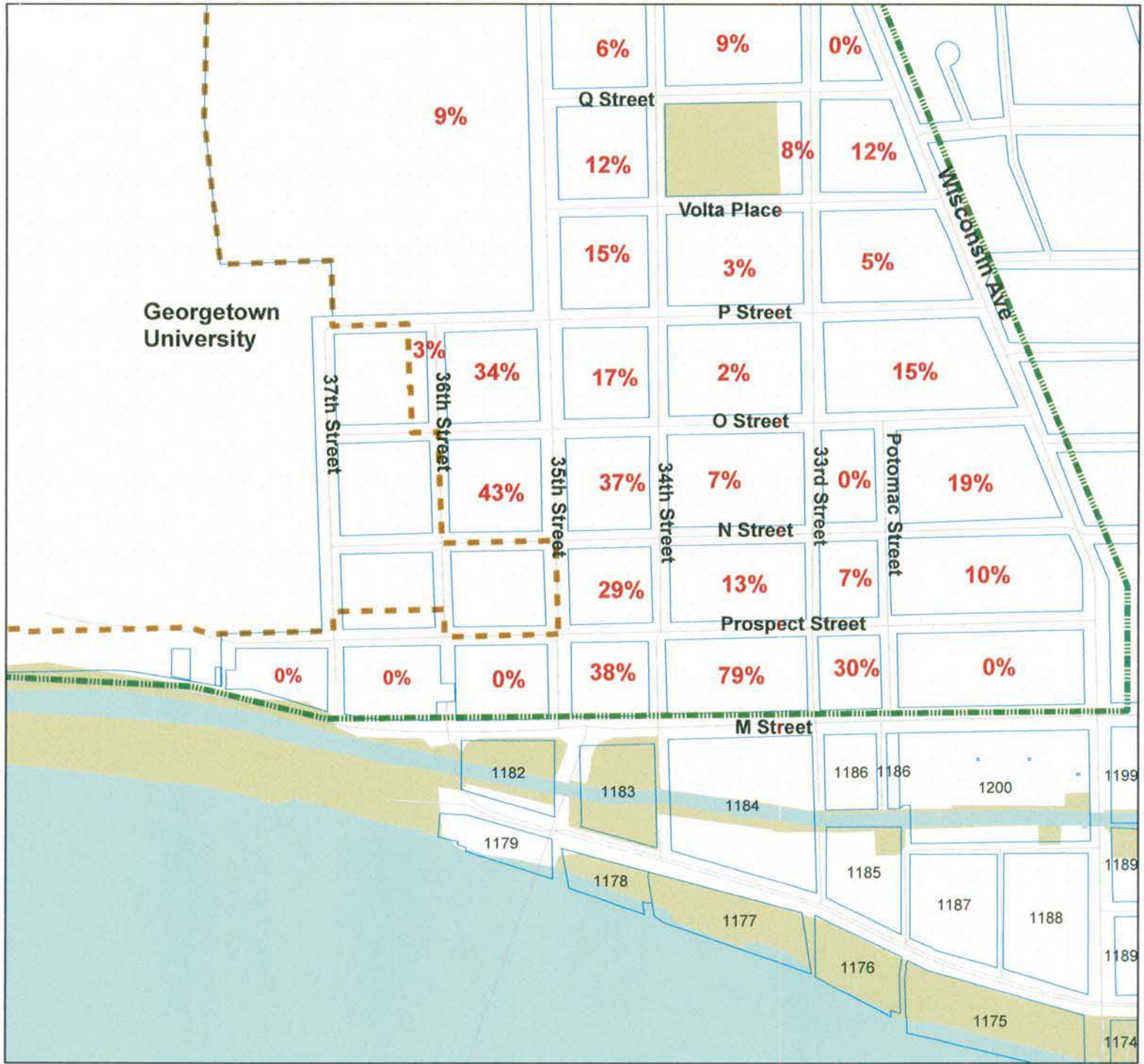


Government of the District of Columbia

Office of Planning ~ April 6, 2011

This map was created for planning purposes from a variety of sources. It is neither a survey nor a legal document. Information provided by other agencies should be verified with them where appropriate.

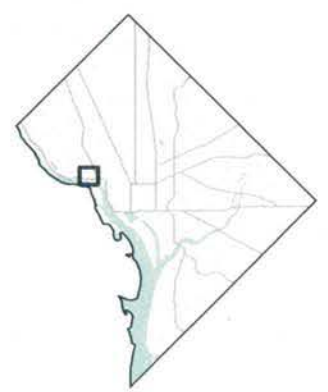
MAP 2



Government of the District of Columbia
Office of Planning ~ April 6, 2011
This map was created for planning purposes from a variety of sources. It is neither a survey nor a legal document. Information provided by other agencies should be verified with them where appropriate.

West Georgetown

- Property Squares
- College Campuses
- Street Centerlines
- Water
- Parks



MAP 3

MPDCalla_Mardin

COUNT_

- 1.000000 - 3.000000
- 3.000001 - 7.000000
- 7.000001 - 16.000000
- 16.000001 - 24.000000
- 24.000001 - 54.000000

Zip Codes

Qtown Student Locations

Number of Students

- 1 Student
- 2-10 Students
- 11-20 Students
- Over 20 Students

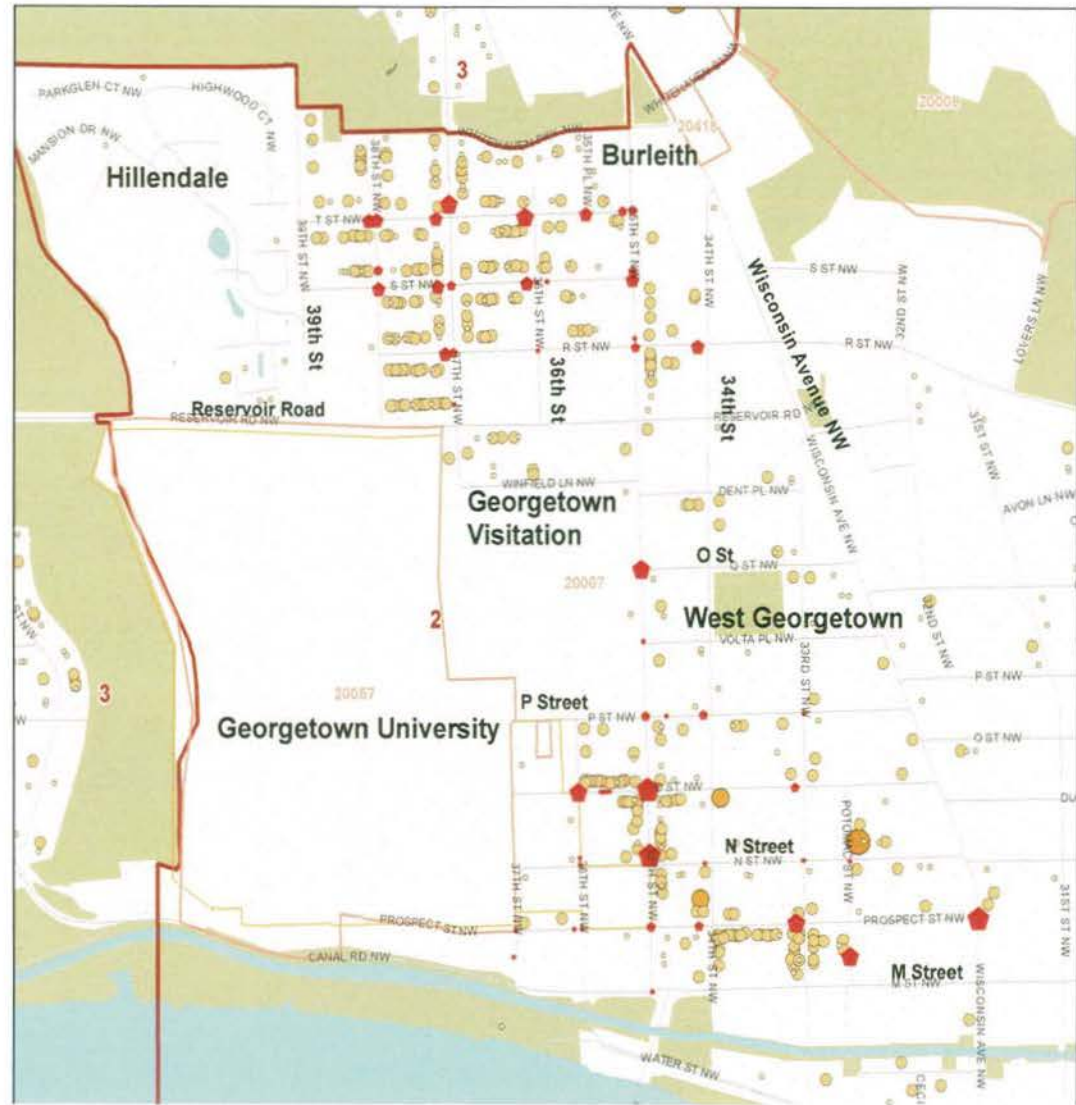
College Campuses (Zoning)

Parks

Water

Street Centerlines

2002 Wards



On-Campus Student Housing

Under the 2000 and the proposed 2010 plans, freshmen, sophomores and transfer students under the age of 21 are required to live in campus housing. This includes 111 beds in 27 university-owned townhouses in the 1400 block of 36th Street, NW and the 3600 block of Prospect Street, NW that are outside the campus boundary. According to the university there are 5053 University provided beds and 6652 traditional undergraduates, thus 1599 (24%) traditional undergraduate students are living off-campus.

A comparison of major universities in the District of Columbia indicates that Georgetown houses a higher percent of undergraduates on campus or in campus housing than most universities in the District of Columbia.

University	Percent Housed
American	65% of all undergraduates
Gallaudet	85 % undergraduates & graduates (est)
George Washington	73% of all undergraduates 100% of Freshman & Sophomores
George Washington- Mt. Vernon	46% of all undergraduates
Georgetown	76 % of all undergraduates 100% of Freshman & Sophomores
Howard	59% of all undergraduates 98% of Freshman

However, many universities of competitive standard to Georgetown house 100% of their students on campus. Harvard, MIT and Princeton are among other universities that require all of their undergraduate students to live on campus. Duke requires all students to live on campus for the first three years. Through interviews with the Office of Planning, these universities reported that they do not make this requirement because of local regulation, but rather to control student behavior.

The standard for zoning approval is not one of comparative percentage to other universities but one of adverse impact and objectionable conditions on neighboring properties. In this area of the City the homes are physically attached and noise, littering and disturbance of the peace is more immediately felt and less easy to avoid than in the other detached or high-rise areas.

In the 1990 Campus Plan Order (BZA Application 15302), Finding of Fact Number 24, states that the University was providing "housing for approximately 83 percent of its undergraduate students":

24. The University presently has housing for approximately 83 percent of its undergraduate students. As described, in Appendix H to the Bicentennial Campus Plan, at the community's request, the University has agreed to significantly increase the supply of on-campus beds for undergraduate students and to create a residential college environment. Specifically, the Bicentennial Campus Plan proposes the following:

- a. To adopt as a long term goal of the University the ability to provide housing for 100 percent of its undergraduate students on campus.*

In the 2000 Campus Plan Order (BZA Application 16566) the 100% goal is no longer referenced but Preliminary Matters Item Number 8 states:

8. *Currently, approximately 77 percent of the University's traditional undergraduate students live on campus. "Traditional undergraduate students" do not include students of English as a second language, commuters, and other non-traditional students not requiring University housing.*

And Item 10 states:

10. *The Applicant testified that at least 84 percent of undergraduates will live on campus by 2010, with the requested increase in enrollment 389 deferred until the Southwest Quadrangle is completed and then phased in at a rate of 110 more than 55 students per year. June 13, 2000 Transcript at 61.*

As of 2010 the current percent of undergraduates housed on campus is only 76% (5053 beds / 6642 TUS) With the provision of the proposed 250 new beds the percentage would be 80%.

It is encouraging that the University is moving to house more undergraduates on the main campus. Additional housing is necessary to mitigate the adverse impacts resulting from the number of students. In the past twenty years and two campus plans an expectation was documented through the campus plan approvals that there would be an increase in the percentage of on-campus undergraduates yet it has not materialized while the overall total enrollment has almost doubled in the same time and the number of uncapped students has grown by 286%:

Enrollment Growth of Total Maximum

Percent change between 1990-2000 and 2010-2020 = $(15000-7577)/7577 = 98\%$ increase

Enrollment Growth of Un-capped Students

Percent change between 1990-2000 and 2010-2020 = $(8348-2160)/2160 = 286.5\%$ increase

The proposed Ten Year Development Plan Land Uses map (Exhibit G of the Application) identifies many areas as appropriate for residential but the Plan actually groups residential together with campus life and athletic uses. OP supports on-campus mixed use facilities that result in an efficient use of land, reduced pressure on housing in nearby neighborhoods, and are designed and managed in a way that minimizes objectionable impacts on adjacent communities. However the Land Use Plan needs to be accompanied by a commitment to a comprehensive housing program to ensure that the TUS enrollment does not pose an objectionable impact because of the integral residential program.

Reviewing the student enrollment history, the housing patterns off campus and crossing that information with a review of calls to MPD, OP concludes that the number of students as currently proposed will affect adversely the use of neighboring property in accordance with the intent of the residential zoning to maintain a family-life environment (§§ 3104 and 320.1 11DCMR) and will become objectionable to the neighboring property (§210.2 11 DCMR).

To address the issue of adverse impact and objectionable conditions due to the number of students, OP recommends that a comprehensive housing plan be a condition of the Campus Plan which provides for housing of 100% of the TUS enrollment by Fall 2016 or incrementally reducing the TUS enrollment thereafter until the TUS enrollment equals the university provided housing. The conditions recommended are:

- University provide 250 new beds as proposed in the pre-hearing statement dated March 31, 2011 by the Fall semester of 2014
- University housing be provided for 90% of the TUS enrollment by the Fall semester of 2015; University housing be provided for 100% of the TUS enrollment by the Fall semester of 2016;
- If housing is not provided for 100% of the TUS enrollment by the Fall of 2016, the TUS enrollment shall be reduced annually by 25% of the difference between the TUS enrollment and the number of university provided beds, until 100% of the TUS enrollment is housed in university provided housing approved as part of the Campus Plan, effective for the Fall of 2017 through the Fall of 2020;
- The University may increase TUS enrollment up to the original cap after reductions are made only if additional Campus Plan approved student housing is available for each undergraduate to be enrolled up to the TUS enrollment cap;
- The location of all University provided housing shall be approved by the Zoning Commission as part of the Campus Plan or amendment thereto, and shall not be within zip code 20007 or east of the 37th St University gates;

It is important that the Zoning Commission review the comprehensive housing plan and the proposed locations for any additional housing, especially off-site housing regardless of zone district, due to the potential for adverse impact resulting from how the students move to and from the university.

In addition to a comprehensive housing plan, OP recommends that the maximum total enrollment on the main campus be capped. The proposed cap would not apply to satellite campuses for the School of Continuing Studies (SCS). OP is very supportive of the University's effort to locate the SCS at locations accessible by Metro.

The conditions recommended are:

- Maximum total enrollment shall included TUS enrollment as capped and all other students taking a minimum of one class at the main campus regardless of program or status;
- The maximum total enrollment on the main campus be capped at 12,959¹⁰ for the 2011-2012 and 2012-2013 academic years
- The maximum total enrollment on the main campus be capped at 13,432¹¹ for the academic year 2013-2014
- The maximum total enrollment on the main campus may thereafter be increased to 13,941 subject to any adjustment related to reduction in TUS cap

Student Neighborhood Assistance Program (SNAP)

The Applicant proposes to increase the size of its SNAP program, intended to control student behavior off-campus. The proposal included doubling the SNPA patrol cars from one to two cars, funding three off-duty MPD officers to patrol the neighborhood and hiring two Community Advisors to live in the Burleith and West Georgetown neighborhoods.

Residents of the surrounding communities, especially Burleith and West Georgetown, have informed the Office of Planning that they do not find these measures to be effective. OP is concerned that increasing

¹⁰ 12,959 equals the proposed cap of 6652 traditional undergraduates and the enrollment at the end of the 2010 Campus Plan of 4,485 graduate and 822 medical students as noted in Appendix L of the Application and 1,000 Continuing Studies/non-degree/2nd Degree Nursing students;

¹¹ The increase represents a 7.5% annual increase after 2013; historic figures represent an estimated annual growth in graduate and non-traditional undergraduate growth since 2008 in a range of 6%-7%.

the size of this program may not improve its effectiveness. Similarly, sanctions imposed by the University are only effective if imposed, and the filing of an annual report with the ANC and the Office of Planning of students and houses with repeated violations would only succeed if the sanctions were severe enough. Adverse impacts on the community by students are not limited only to their actions and behavior, such as rowdiness, partying and lack of upkeep of properties, but also from the number of students living within a community.

Traffic

In the pre-hearing Statement the Applicant has withdrawn the original request for additional parking spaces on-campus. Consistent with this, the relocation of the School of Continuing Studies to a satellite location would further improve the traffic and parking situation in the neighborhood by decreasing the number of students coming to the main campus. The applicant has made several proposals to improve bus traffic by constructing a new loop road on the west side of campus and to permit GUTS busses to turn left out of the campus onto Canal Road. Bus traffic should also be rerouted off of P Street to lessen the impact on the residences located there. However, all of these have obstacles to overcome and the applicant is working directly with DDOT on the overall transportation issues.

The applicant must continue to work with the National Park Service (NPS) concerning the construction of the loop road. The location of an easement, the removal of trees and the impact on Glover-Archbold Park are all items that must be resolved as part of the transportation plan.

The applicant must also continue to work with DDOT on the Canal Road entrance, and the realignment of this entrance onto Reservoir Road near 38th Street. Realignment of this entrance must not result in an increase in university traffic through Burleith.

Noise

The communities surrounding the university, especially Burleith and West Georgetown, have complained about late night noise within the community, especially from off-campus parties and students walking drunk throughout the streets. The plan proposes to increase the size of the SNAP patrol and impose sanctions. Although these programs were implemented under the previous plan, noise continues to be a problem. An increase in the percentage of students living on campus would serve to decrease the problem. However, the applicant only proposes to move 250 students onto campus, out of approximately 1,600 undergraduates living off campus. This would still leave over 1300 undergraduate students in off-campus housing. Similar to what other universities have undertaken, housing one hundred percent of the undergraduate students on campus has been found to be the most effective means of controlling student behavior.

210.3 In R-1, R-2, R-3, R-4, R-5-A, and R-5-B Districts, the maximum bulk requirements normally applicable in the districts may be increased for specific buildings or structures; provided, that the total bulk of all buildings and structures on the campus shall not exceed the gross floor area prescribed for the R-5-B District. In all other Residence Districts, similar bulk increases may also be permitted; provided, that the total bulk of all buildings and structures on the campus shall not exceed the gross floor area prescribed for the R-5-D District. Because of permissive increases as applicable to normal bulk requirements in the low-density districts regulated by this title, it is the intent of this subsection to prevent unreasonable campus expansion into improved low-density districts.

The application proposes a FAR of 1.51, less than the maximum 1.80 permitted.

210.4 *As a prerequisite to requesting a special exception for each college or university use, the applicant shall have submitted to the Commission for its approval a plan for developing the campus as a whole, showing*

the location, height, and bulk, where appropriate, of all present and proposed improvements, including but not limited to the following:

- (a) Buildings and parking and loading facilities;*
- (b) Screening, signs, streets, and public utility facilities;*
- (c) Athletic and other recreational facilities; and*
- (d) A description of all activities conducted or to be conducted on the campus, and of the capacity of all present and proposed campus development.*

The applicant has submitted plans, included as Exhibit E and Exhibit J, depicting the proposed campus plan for all present and proposed development. It proposes the following:

- Academic/ administrative: 194,500 GSF
- Residential/campus life/athletics space: 196,500 GFA
- Medical/health care space: 1,041,436 GSF
- Academic/administrative/medical/health care space: 97,500 GSF

However, it does not include the amount of space that would be devoted to the proposed 250 beds if those units are to be constructed on the main campus. The applicant has represented that they are considering locating the 250 new beds in the current Leavey Center. OP is very supportive of that location.

The submitted plan does not adequately address the impact of a "Future Hospital Building" or the additional of 500,000 square feet of "Main Hospital". Hospitals have very unique and intense operations and need to be fully understood to assess potential impacts on traffic, and the neighborhood. In combination with the withdrawal of the request of parking, OP recommends that:

- Further processing for the Medical Facilities (including MedStar Health) be limited to those identified as MHC-1 through MHC-4, MHC-6 and MHC-15 and that a more comprehensive plan for the Medical Facilities' growth be provided as an amendment to the 2010-2020 Campus Plan, including parking and traffic impacts.

210.5 *Within a reasonable distance of the college or university campus, and subject to compliance with § 210.2, the Commission may also permit the interim use of land or improved property with any use that the Commission may determine is a proper college or university function.*

No interim use of land is proposed.

210.6 *When a major new building that has been proposed in a campus plan is instead moved off-campus, the previously designated site shall not be designated for, or devoted to, a different major new building unless the Commission has approved an amendment to the campus plan applicable to the site; provided, that for this purpose a major new building is defined as one specifically identified in the campus plan.*

No major new building is proposed to be moved off-campus.

210.7 *In reviewing and deciding a campus plan application or new building construction pursuant to a campus plan, the Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan.*

Relevant policies of the Comprehensive Plan are listed below. The proposed plan is inconsistent with many of the policies of the Comprehensive Plan, including minimizing impact and reducing housing pressure on surrounding residential communities, providing on-campus housing to minimize the impacts of the number of students on surrounding residential communities, and supporting community improvement and neighborhood conservation.

- 210.8 *As an integral part of the application requesting approval of new building construction pursuant to a campus plan, the college or university shall certify and document that the proposed building or amendment is within the floor area ratio (FAR) limit for the campus as a whole, based upon the computation included in the most recently approved campus plan and the FARs of any other buildings constructed or demolished since the campus plan was approved.*

The application proposes a FAR of 1.51, less than the maximum 1.80 permitted.

- 210.9 *Before taking final action on an application for use as a college or university, the Commission shall submit the application to the D.C. Office of Planning and the D.C. Department of Transportation for review and written reports.*

The applicant is working directly with the District Department of Transportation. DDOT will file a separate report and recommendation on whether the current proposal will result in objectionable conditions due to traffic and parking.

COMPREHENSIVE PLAN

The proposed development is located within the Near Northwest Area of the Comprehensive Plan, and is inconsistent with many of the following policies of Near Northwest Element of the Plan:

Policy LU-2.3.5: Institutional Uses

“Recognize the importance of institutional uses, such as private schools, child care facilities, and similar uses, to the economy, character, history, and future of the District of Columbia. **Ensure that 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.** Encourage institutions and neighborhoods to work proactively to address issues such as traffic and parking, hours of operation, outside use of facilities, and facility expansion.”

Policy LU-3.2.3: Non-Profits, Private Schools, and Service Organizations

“**Ensure that** large non-profits, service organizations, private schools, seminaries, colleges and **universities**, and other institutional uses that occupy large sites **within residential areas are planned, designed, and managed in a way that minimizes objectionable impacts on adjacent communities.** The zoning regulations should ensure that the expansion of these uses is not permitted if the quality of life in adjacent residential areas is significantly adversely affected.”

Policy EDU-3.3.2: Balancing University Growth and Neighborhood Needs

“Encourage the growth and development of local colleges and universities in a manner that recognizes the role these institutions play in contributing to the District’s character, culture, economy and is also consistent with and **supports community improvement and neighborhood conservation objectives. Discourage university actions that would adversely affect the character or quality of life in surrounding residential areas.**”

Policy EDU-3.3.4: Student Housing

“**Encourage the provision of on-campus student housing in order to reduce college and university impacts on the housing stock in adjacent neighborhoods.** Consider measures to address the demand for student housing generated by non-District institutions with local branches.”

Policy EDU-3.3.5: Transportation Impacts of Colleges and Universities

“Support ongoing efforts by colleges and universities to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, shuttle service, bicycling, and other transportation demand management measures. The provision of adequate on-site parking for institutional uses also should be encouraged.”

Policy NNW-1.1.8: Student Housing

“Support and promote efforts by the area’s universities to develop on campus dormitories in order to **reduce pressure on housing in nearby neighborhoods.**”

The university needs to balance its growth so as to lessen the impact it has on the surrounding communities. The high percentage of student occupied housing within the neighborhoods surrounding the university adversely affects quality of life, adversely affects the housing stock and is not consistent with neighborhood conservation.

FUTURE LAND USE MAP: The University’s main campus is identified as Institutional: “Includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions.”

As noted above, the Comprehensive Plan Future Land Use Map identifies the residential neighborhoods surrounding the University as moderate density residential to the east and low density residential north of the campus. The Comprehensive Plan Generalized Policy Map identifies all residential areas surrounding Georgetown University as Neighborhood Conservation Areas which anticipates that institutional uses will be developed at a moderate scale but also establishes an explicit “guiding philosophy” of “*conserving and enhancing neighborhoods within this category.*”

COMMUNITY COMMENTS

Councilmember Evans submitted a letter to the file in opposition to the application.

ANC 2E passed a resolution on February 28, 2011, indicating that the proposed campus plan would have serious adverse effects on the community and would be highly objectionable.

ANC 3D, Citizens Association of Georgetown, the Burleith Citizen Association and the Foxhall Community Citizens Association are in opposition to the application.

Many letters have been sent to the file by individuals both in support and in opposition.

RECOMMENDATION

OP recognizes the university’s need to improve and grow and its many contributions to the city and life of District residents however, the standards for approval of a campus plan are explicitly focused on not being “objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions”.

OP supports the applicant’s proposal to move the School of Continuing Studies off-campus, and to construct 250 new dormitory beds either on the main campus or elsewhere. However, although a step in the right direction, 250 is a small number and represents only 22 percent of the undergraduate students living off-campus. It does not address the issue of the remaining 1000 plus undergraduate students that would still be living within the zip code 20007.

The Office of Planning recommends approval of the proposed 2010-2020 campus plan with the following conditions:

Undergraduate Enrollment:

1. The traditional undergraduate student (TUS) enrollment be capped at 6652¹² as proposed by the applicant in the application dated December 30, 2010 and the Pre-hearing Submission dated March 31, 2011;

Maximum Total Enrollment

1. Maximum total enrollment shall include TUS enrollment as capped and all other students taking a minimum of one class at the main campus regardless of program or status;
2. The maximum total enrollment on the main campus be capped at 12,959¹³ for the 2011-2012 and 2012-2013 academic years
3. The maximum total enrollment on the main campus be capped at 13,432¹⁴ for the academic year 2013-2014
4. The maximum total enrollment on the main campus may thereafter be increased to 13,941 subject to any adjustment related to reduction in TUS cap

Campus Housing

1. University provide 250 new beds as proposed in the pre-hearing statement dated March 31, 2011 by the Fall semester of 2014
2. University housing be provided for 90% of the TUS enrollment by the Fall semester of 2015;
3. University housing be provided for 100% of the TUS enrollment by the Fall semester of 2016;
4. If housing is not provided for 100% of the TUS enrollment by the Fall of 2016, the TUS enrollment shall be reduced annually by 25% of the difference between the TUS enrollment and the number of university provided beds, until 100% of the TUS enrollment is housed in university provided housing approved as part of the Campus Plan, effective for the Fall of 2017 through the Fall of 2020;
5. The University may increase TUS enrollment up to the original cap after reductions are made only if additional Campus Plan approved student housing is available for each undergraduate to be enrolled up to the TUS enrollment cap;
6. The location of all University provided housing shall be approved by the Zoning Commission as part of the Campus Plan or amendment thereto and shall not be within zip code 20007 or east of the 37th St University gates;

Enrollment Calculation

1. Compliance with enrollment counts shall be calculated each semester and not calculated by averaging between semesters;

Medical Facilities

1. Further processing for the Medical Facilities (including MedStar Health) be limited to those identified as MHC-1 through MHC-4, MHC-6 and MHC-15 and that a more comprehensive plan for the Medical Facilities' growth be provided as an amendment to the 2010-2020 Campus Plan, including parking and traffic impacts.

¹² Appendix L of the Dec. 30, 2010 Application Page 3 Sections V and VI.

¹³ 12,959 equals the proposed cap of 6652 traditional undergraduates and the enrollment at the end of the 2010 Campus Plan of 4,485 graduate and 822 medical students as noted in Appendix L of the Application and 1,000 Continuing Studies/non-degree/2nd Degree Nursing students;

¹⁴ The increase represents a 7.5% annual increase after 2013; historic figures represent an estimated annual growth in graduate and non-traditional undergraduate growth since 2008 in a range of 6%-7%.

Additional information

1. Additional information be provided regarding the duration and definition of “temporary employees, employees of contractors or other non-university owner or controlled entities” that would have staff or employees coming to the campus and their means of getting to and from the main campus.

The Office of Planning also recommends that the applicant work with DDOT and NPS to work out solutions to the proposed loop road, to the intersection of 38th Street and Reservoir Road, and to the Canal Road entrance as it relates to the routing of the GUTS buses and the use of P Street, before the Commission takes action.