



REPORT OF URBAN PLANNING CONSULTANT
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TO
CITIZENS ASSOCIATION OF GEORGETOWN
AND
THE BURLEITH CITIZENS ASSOCIATION
ON
GEORGETOWN UNIVERSITY
2010-2020 CAMPUS PLAN
WASHINGTON, D.C.

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ZONING COMMISSION
District of Columbia

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EXHIBIT NO. 90

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Executive Summary

Report of Urban Planning Consultant George H. F. Oberlander, AICP.

Funded by the Citizens Association of Georgetown and the Burleith Citizens Association, the purpose of this Report is to:

1. examine the Draft April 26, 2010 “ Final Campus Plan” and the December 30, 2010 submitted Georgetown University Campus Plan, 2010-2020”;
2. identify any proposals in the Campus Plan which are likely to become objectionable to neighboring property or tend to adversely affect that neighboring property;
3. examine and evaluate data obtained from neighborhood surveys and DC Government sources relevant to standards identified in the DC Zoning Regulations; and
4. determine whether the Campus Plan complies with the applicable standard for Campus Plans in the Regulations and is not inconsistent with the Comprehensive Plan for the National Capital.

The Georgetown University campus comprises 104 acres zoned D/R-3 and in part C-1. The D overlay to the R-3 designation permits chancery facilities subject to the disapproval of the (special) Board of Zoning Adjustment.

The adjoining neighborhoods of Burleith and West Georgetown are also zoned R-3, a zoning category designed for one family row dwellings mixed with one-family detached, and one-family semi-detached dwellings.

The Regulation provide that Colleges and Universities, including University hospitals and dormitories, proposed to be located on the campus of the university, shall be permitted as Special Exceptions in the R-1, R-2 & R-3 zones if approved by the Zoning Commission for the District of Columbia.

The standards under which such special exceptions can be granted stipulate that “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” (11 DCMR §210.2) and “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... (Emphasis added) (11 DCMR §3104.1).

The Regulations also state: **“In reviewing and deciding a campus plan application..., the Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan.” (11 DCMR §210.7) (Emphasis added)**

In addition to the regulatory standards, DC Code Section 6-641.02 states that: **“Zoning maps and regulations and amendments thereto, shall not be inconsistent with the Comprehensive Plan for the National Capital”. (Emphasis added)**

The Report highlights the student enrollment history as contained in the 10 previously submitted Campus Plans, and examines the impacts of the December 30, 2010 submitted Plan for 2020 **which proposes a maximum total student enrollment**, excluding the off-campus Law School, **of over 16,100 students** (calculated from a current total IPEDS headcount of 14,033) with nearly **10,000 employees** on campus for a **total count of over 25,000 persons and no additional undergraduate housing on campus.**

The 1971 approved campus plan contained a fact sheet which included its dedication **“toward the maintenance and enhancement of a smaller university of the highest quality”** and that **“Its growth has been set, as an outside limit not to exceed 10,000 students (exclusive of the Law Center)”**.

The 1990 Campus Plan proposed “To adopt as a long term goal of the University, the ability to provide housing for 100% of its undergraduates students on campus.” The approval for that Campus Plan included the first undergraduate enrollment cap at 5,627 FTE students.

In the Campus Plan approval dated December 5, 2000, the Board of Zoning Adjustment stated:

“The Board finds that the number of undergraduate students at the University is having an adverse impact on the surrounding neighborhood because of frequent occurrence of serious student misconduct off-campus and the displacement of permanent, non-student housing as a result of the lack of sufficient on-campus housing.”

That Campus Plan order was revised in 2003 and concluded that the construction of 780 beds on campus and a new program aimed at improving the behavior of students living off campus would minimize any additional possible adverse impacts on the adjoining neighborhood. That order increased the traditional undergraduate enrollment cap by 389 students for a maximum current cap of 6,016. [See BZA Order 16566 F, p.18 for this cap number]. http://dcoz.dc.gov/orders/16566F_1222-62.pdf

Each of the Campus Plans proposed substantial increases in campus activity and total persons on campus. The University’s commitment to housing 100% of its undergraduate students on campus was dropped in the 2000 Campus Plan and is not included in the new Campus Plan.

Section V of the Report identifies serious deficiencies in both the current and the proposed Campus Plan and discusses the impacts of those deficiencies on the adjoining neighborhoods. The deficiencies are:

- the inadequate amount of undergraduate housing on Campus;
- the absence of any graduate housing on the main campus;
- the continuing increase in total number of students, faculty/staff and visitors each academic year; and
- the very limited and ineffectual student affairs remedies provided for off-campus students to the impacted neighborhoods.

These impacts are addressed under the following headings:

- Number of students requiring housing;
- Housing proposed
- Level of student housing peer institutions provide;
- The George Washington University impacts on its nearby residential area; and
- A literature search on student off-campus housing impacts on residential neighborhoods.

The Campus plan provides no effective provisions to reduce and/or eliminate the current existing adverse impacts, of student off-campus housing concentrations, already in the surrounding neighborhoods.

The Draft Campus Plan contained a proposal to house 120 graduate students and/or faculty in the 1789 Block, (Sq.1223) as five-story mixed use buildings. Building such a housing density at the eastern edge of the Campus is not in keeping with the adjacent lower scaled residentially zoned area. **This housing proposal is not contained in the December 30, 2010 submitted Campus Plan.**

The University asserts that graduate students are more mature and implies that they do not create misconduct incidences to the extent that undergraduates do. Nevertheless, graduate students keep different hours than families, and do participate in loud late night parties disturbing adjoining homes and intensifying nightly parking problems. They are also part of the induced demand for poorly maintained investor owned group housing that is destabilizing adjoining one-family owner occupied residential areas.

A separate survey, prepared by planning consultant Shannon S. Christmas MCP, was undertaken, comparing the GU undergraduate student housing ratio with peer universities nationally. **The comparison study shows that of the other 35 nationally listed Universities surveyed, GU ranks 23rd by housing only 73% of its total undergraduates. The enrollment numbers in the 2010-2020 Campus Plan show that GU actually houses only about 67% of its total undergraduates on campus.**

The study makes two basic points;

1. GU compares poorly when compared with its peer institutions because it is not the residential college that it pledged to become in 1990, and
2. literature and experience in the District's Foggy Bottom neighborhood indicates that when a university reaches the size of GU or GW the negative impacts on the surrounding lower density communities outweigh any benefits to the community and the city.

The DC Office of Planning's Report on the George Washington University Campus Plan 2000 analysed GW's impact on the Foggy Bottom neighborhood and concluded that the **"impact is from the students not housed in University housing who live in the surrounding community...If this number becomes too large, the character of the community begins to change, and the area can become perceived as a largely**

transient community of students rather than a community with a significant number of more permanent residents”. (Emphasis added) OP concluded that Foggy Bottom had reached the tipping point and that GW needed to house more of its undergraduate students to avoid further deterioration of the residential neighborhood.

The literature search dealing with student off-campus impacts on residential neighborhoods found two empirical studies that demonstrate rental externalities have negative impacts on property values. **Both studies demonstrate that rental and student rentals can negatively impact one-family properties.**

During the 2000-2010 GU Campus Plan hearings, the location of off-campus student housing was a major focus. Based on the percentage of undergraduates living off-campus in Zip Code 20007, surrounding the University, the Office of Planning accepted GU’s forecast that 809 undergraduates would be living off-campus in that Zip Code by the year 2010. **That forecast was exceeded as the University provided numbers show 1,195 undergraduates living in Zip Code 20007 in the fall of 2009, a difference of plus 48%.**

The GU forecast in 2000, concerning the reduction of students living off-campus as a result of constructing the 780 undergraduate Southwest Quadrangle, obviously **did not come true.**

University data, dated April 26, 2010, indicates a total of 1,166 undergraduate students and 374 graduate students living in Georgetown and Burleith (Fall 2009) for a total of 1,540.

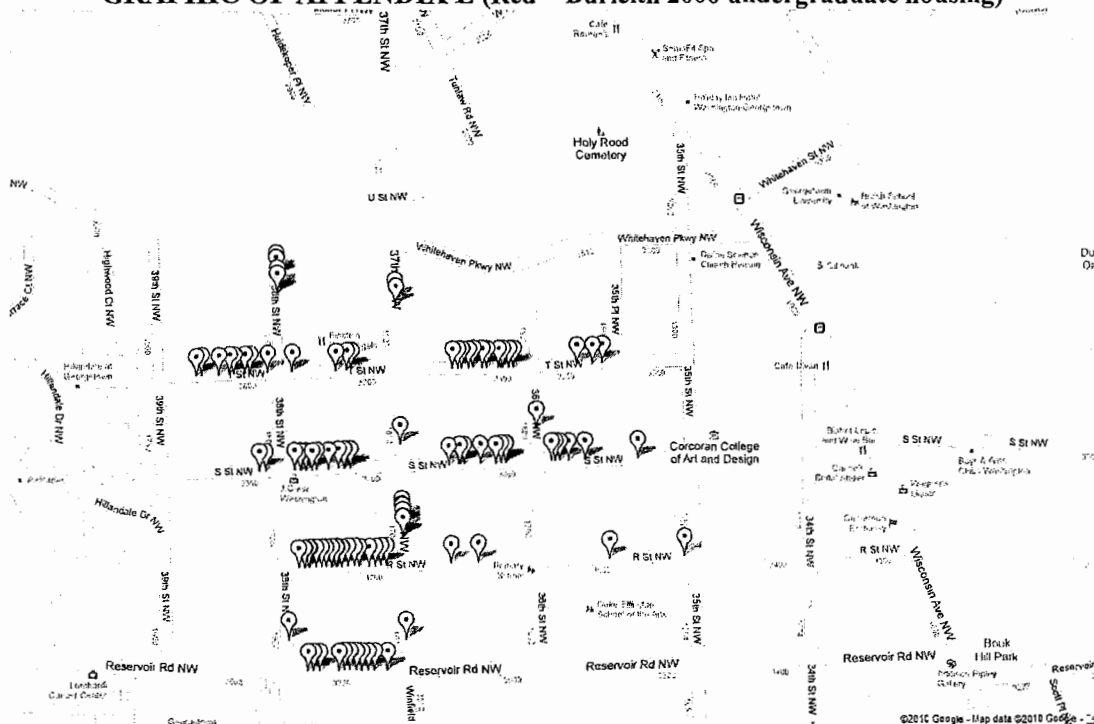
(http://www8.georgetown.edu/admin/publicaffairs/spring2010_campusplanpresentation.pdf, ps. 18-19)

Section VI documents what actually happened as a result of the Southwest Quadrangle construction. Some of the off-campus housing units were vacated in 2004 when the 780 new dormitory beds became available. However, the units vacated in the community were re-filled by 2009. The 1,243 traditional undergraduates living in Zip Code 20007 in the spring of 2000 had decreased to 759 in 2004.

(<http://www.georgetown.edu/about/campus-plan>, Off Campus Housing Numbers) That figure, according to University data, increased by the fall of 2009 to 1,195. To that number must be added the 111 students living in University owned townhouses in W. Georgetown, bringing the total to 1306 undergraduates, significantly more than in the Spring of 2000.

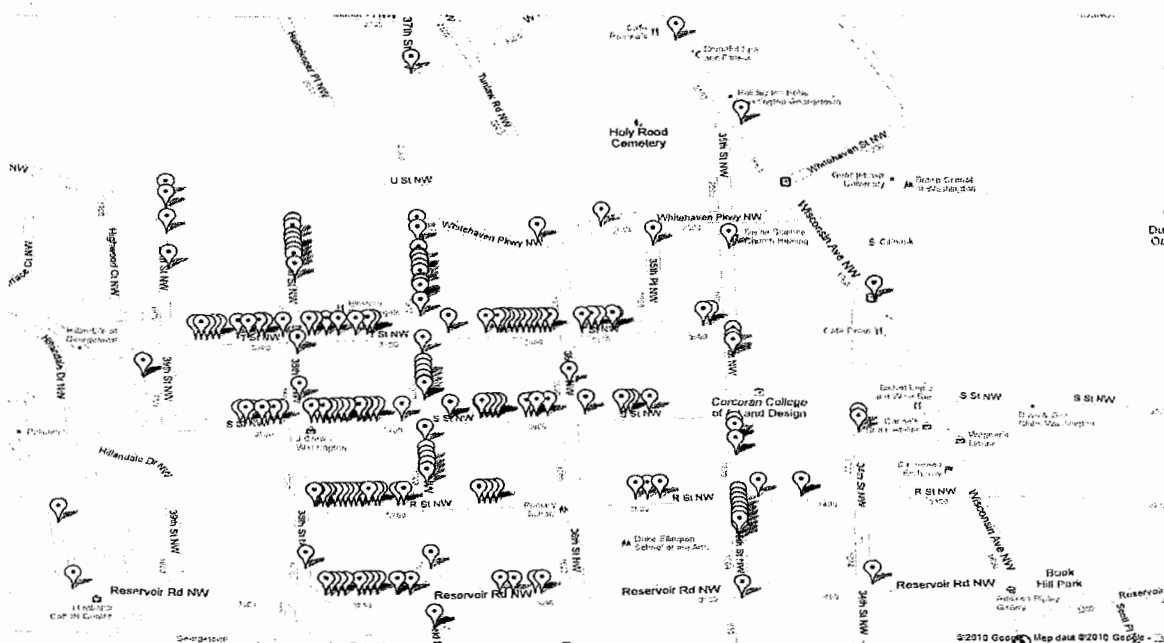
A specific impact example of this off-campus increase is provided by the recent house-to-house survey of Burleith. In 2010, 9 of the 22 homes are student occupied comprising 41% of the 1900 block of 38th St. NW. On the basis of student addresses in Burleith in 2010, the survey found 165 locations had student occupancy. **Accounting for 31% of the Burleith housing stock. Appendix D-2**

Burleith 2000 Student Housing Locations*
GRAPHIC OF APPENDIX E (Red = Burleith 2000 undergraduate housing)



* Represents GU undergraduate group houses based on a Burleith 2000 door-to-door survey.

Burleith 2010 Student Housing Locations**
GRAPHIC OF APPENDIX F (Red undergrad, Yellow grad, Burleith 2010 student housing)



** Represents GU graduate and undergraduate housing based on a Burleith 2010 door-to-door survey and GU's housing directory. The 2010 survey included graduate and undergraduate houses. The red markers indicate undergraduate houses and the yellow markers graduate houses.

Section VII identifies the locations of student off-campus misconduct and other negative/adverse impacts on the one-family zoned areas. The objectionable conditions include:

- the high density of the many student group homes in West Georgetown and Burleith;
- the loud noise generated by students at late night parties and returning to campus;
- binge drinking and alcohol-fueled disorderly students;
- public urination, vandalism and student fights;
- trash on private and public areas creating blight conditions; and
- unsafe and unsightly housing caused by poorly maintained property of absentee landlords.

These impacts are documented from public records and field inspections, 911 disorderly phone calls, trash violations and complaints to the University off-campus affairs office, and the disruptive nature of the off-campus student occupancy of the Magis Row townhouses along 36th Street, NW, owned by the University. This data shows the cumulative adverse impacts created by the concentration of students living in residential ownership properties converted to group homes and dormitory style-living.

Collectively and individually these objectionable conditions adversely impact the quality of life in Burleith and West Georgetown.

Based on the review of the Campus Plan proposals to date, the approval and implementation of the Plan **will become objectionable to neighboring property and thereby not meet regulatory standards due to the following:**

- the proposed total number of students, faculty and staff;
- the existing number of students already living within Burleith and West Georgetown and the failure of University policy to address effectively the existing adverse impacts the off-campus students exert on the neighborhoods;
- the absence of additional undergraduate housing on campus;
- the existing traffic and parking levels, studied and documented by a traffic expert;
- the level of disorderly conduct of students living within and visiting the immediate campus neighborhoods disturbing adjoining homeowners;
- the above average “911 calls” to police, concerning complaints of disturbing the peace; and
- the weekly public health abuses and sidewalk obstructions from trash violations and calls for police services to residential blocks with high concentration of student off-campus housing.

Relevant District Elements of the Comprehensive Plan for the National Capital are identified and listed in Section IX. The Report concludes **that approving the Campus Plan, as submitted would be contrary to a number of Comprehensive Plan policies and statements**, the most important of which are Area Element Policy NNW-1.1.8 dealing with student housing in Burleith and Georgetown, and Policy EDU-3.3.4 dealing with development of on-campus dormitories in order to reduce the pressure on housing in nearby neighborhoods.

The proposed Loop Road at the western edge of the Campus is a good concept but allowing any possibility of “cut through” traffic from Canal Road and/or Reservoir Road must be controlled. This has been a long standing community concern.

Section XII describes the Draft Plan proposal for graduate and/or faculty housing in the interior of Block 1789. This proposal (**not contained in the December 30, 2010 submitted Plan**) would raise location and density issues in a neighborhood already impacted by students. The best use of the interior of this Square is open space for passive recreation. Adding student housing to this Square would further aggravate the student housing density along 36th Street.

Representatives of the University have presented their plans at several community meetings at which the community has expressed its main continuing concern being the lack of any provision for additional on-campus undergraduate housing in the Campus Plan. To date the University has not been willing to include sufficient undergraduate on-campus housing to substantially reduce the existing off-campus student population in Burleith and West Georgetown.

The principal conclusions of the Report are as follows:

- Earlier campus plans and the University have not adequately addressed reducing the concentration of students in group housing in the adjoining residential neighborhoods.
- The major adverse impacts have been and continue to be generated by the current number and concentration of students living near the University, and the increase in traffic and parking related to the number of students, employees and visitors.
- There is no evidence presented that the proposed increase in total student levels, increase in employment and other on-campus activities, will not overcrowd the campus.
- The proposed enrollment increase will further increase transiency in Burleith and Georgetown contrary to Comprehensive Plan policies among which is “relieving growth pressures on neighborhoods adjacent to existing campuses”. (Policy EDU-3.3.1, paragraph 1214.5)
- Moving the entire (growing) continuing education student body who now attend school in rented space in Virginia to the main campus, plus the proposed increase in graduate students, faculty/staff and the rebuilding/enhancing of the medical facilities will produce greater cumulative population and vehicle density on and near the campus which will increase negative impacts on the adjacent neighborhoods.
- Although an undergraduate enrollment cap has been established since 1990, no graduate cap, maximum student level or total employee cap on campus exists. Calculating the undergraduate number of students on an average basis between the fall and spring enrollments, in order to numerically stay within the cap, does not reduce the impact of the number of students living off-campus each fall. **The December 30, 2010 submitted Campus Plan now proposes an IPEDS total student headcount of 16,133. Increasing enrollment without adequate on-**

campus undergraduate housing will exacerbate the existing adverse impacts on the surrounding neighborhoods.

- The December 30, 2010 GU proposed “voluntary maximum Main Campus student headcount” for 2020, at 16,133 students, does not address or reduce the number of students living off-campus.
- The CAG and Burleith data indicates the existing neighborhood objectionable conditions caused by noise, traffic, number of students and additional objectionable conditions makes living adjacent to the current magnitude of student group housing undesirable and adversely affects the quality of life.
- The concentration of student housing has altered the one-family home ownership character of large sections of the adjoining neighborhoods to transient conditions, adversely impacting the quality of daily life.
- Total enrollment by 2020 is projected to be over 16,000 as compared with the current enrollment IPEDS headcount of 14,033. Including the faculty and staff increase proposed, the campus population would reach between 24,000 and 25,000 persons. This total will produce more traffic and parking demand, more off-campus housing demand, and in turn will contribute further to the identified objectionable conditions imposed on the neighborhood.
- The Zoning Regulations seek to “prevent the undue concentration of population and the use of land” as well as “lessen congestion in the streets”. (DC Code Sec. 6-641.02, & Z.R. Sec. 101.1, (b&c)) The projected total campus population by 2020 will not lessen the off campus student population or congestion in the streets.
- The adjoining neighborhoods cannot tolerate additional conversions to group housing without losing the character and fabric of the zoning district as contemplated in the existing R-3 zoning.
- Approving the Campus Plan Special Exception, without substantial changes (or conditions) such as including provisions for on main campus or satellite campus undergraduate housing, would be inconsistent with various policies in the District Elements of the Comprehensive plan for the National Capital.
- The Campus Plan should not be approved as submitted because DC Code, section 6-641.02 and 11 DCMR 210.7 require that “Zoning maps and regulations and amendments thereto, shall not be inconsistent with the Comprehensive Plan”.
- The Plan should not be approved as presented because use as a University has become objectionable to neighboring property because of noise, traffic, number of students, and other objectionable conditions in violation of the Zoning Regulations (11 DCMR §210.2). The Plan does nothing to mitigate current objectionable conditions and instead proposes to exacerbate the objectionable conditions created under the past Plan. Special exception approval also should be denied because the Plan would “tend to affect adversely the use of neighboring property” in violation of the Zoning Regulations (11 DCMR §3104).

The Report concludes that **the submitted 2010-2020 Campus Plan should be revised to incorporate the objective of housing all undergraduates on the Main Campus, to the maximum extent possible and to house the remainder, including graduate students,**

in University owned or rented housing in a satellite campus outside of Zip Code 20007, in keeping with the policies of the Comprehensive Plan.

I. THE GEORGETOWN UNIVERSITY CAMPUS AND ADJOINING COMMUNITIES

The Georgetown University campus, known as premises 3800 Reservoir Road and identified in the DC Board of Adjustment Case #16566H, issued in 2005, comprises 104 acres zoned D/R-3¹ and, in part C-1 (**Appendix T**), is located within the Georgetown Historic District. The campus is bordered on two sides by public parkland and Canal Road, a principal arterial traffic artery. The southern boundary extends east along Prospect Street to 35th Street, excluding the structures on the north side of Prospect Street between 36th and 37th Streets. The northern campus boundary is Reservoir Road, listed in the Comprehensive Plan as a minor arterial. (See DC Surveyor's plat certified 1/28/2000 as part of the 2000-2010 Campus Plan). **Appendix A**

The immediate residential neighborhoods that adjoin the main campus of Georgetown University are, on the east, West Georgetown (west of Wisconsin Avenue), on the north, Burleith and Hillandale, and on the west, Glover Archbold Parkway (a national park) and Foxhall. The southern boundary of the campus abuts the Potomac Palisades Parkway (a national park) and Canal Road.

The neighborhoodinfo.dc.org website lists the Georgetown, Burleith/Hillandale, Foxhall neighborhood cluster comprising ANC 2E with a 2000 residential population of 15,035, **an increase of 2239 people or 17.5% since 1980**. That increase was considerable compared with the city-wide neighborhood clusters which had, on average, a population **decrease** of over 10%. The homeownership rate in 2000 was 53%, also substantially higher than the citywide average of 41%.

The Draft Campus Plan examined is the 43-page power point document presented by University representatives at community meetings held November 18th & 19th, 2009, in the Heritage Room at Visitation School. In addition, numerous other documents, relating to this proposal and previous Campus Plans, on various websites and the files of the Zoning Commission for the District of Columbia (Commission) and Board of Adjustment (BZA) files, have been reviewed.

On December 30, 2010 the University submitted the 2010-2020 Campus Plan to the Zoning Commission. This Report has been updated to include a review of that 31 page document and its 22 Exhibits, as available on the University's website.
(<http://www.georgetown.edu/about/campus-plan/>)

¹ The R-3 zoning is designed for one family row dwellings mixed with one-family detached, and one family semi-detached dwellings. The Diplomatic overlay, D/R-3, mapped for the campus area permits chancery facilities subject to the disapproval by the (special) Board of Zoning Adjustment, pursuant to section 206(b)(2) of The Foreign Missions Act of 1982.

II. THE CAMPUS PLAN IS SUBJECT TO REVIEW AND APPROVAL OF THE ZONING COMMISSION FOR THE DISTRICT OF COLUMBIA

The District's zoning standards for **universities** permits **university use** as a matter of right in areas zoned for **high-density commercial use**. For land zoned **residential** or special purpose, it permits university use as a **special exception**. In the areas where university use is by special exception, **the university must secure permission for specific university projects in a two-stage process**. The first stage is submitting a Campus Plan for a projected time period. The Zoning Commission can approve or disapprove the submitted plan² and its approval can be subject to a set of conditions designed to minimize the impact(s) of the proposed development. In the subsequent second stage(s), the Commission reviews individual building projects that the University proposes to undertake, evaluating them both for consistency with the approved campus plan and the zoning regulations.

The Zoning Regulations are part of the DC Municipal Regulations Title 11 Zoning, and Section 210.1 thereof stipulates **that Colleges and Universities, including university hospitals, dormitories, proposed to be located on the campus of the university, shall be permitted as Special Exceptions in the R-1, R-2 & R-3 zones if approved by the Commission**. The residential areas adjoining the University are zoned R-3. The University Campus is shown on the zoning map as D/R-3.

The standards under which such special exceptions can be granted are stipulated in Sections 210.2 & 3104.1 of the Regulations and provide that **"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" and "will not tend to affect adversely the use of neighboring property..."** (Emphasis added)

There are maximum building bulk requirements for universities located in R-1, R-2 & R-3 areas. Section 210.3 of the regulations stipulates that the maximum bulk "may not exceed the gross floor area prescribed for the R-5-B District," in order to prevent "unreasonable campus expansion into improved low-density districts" such as West Georgetown and Burleith.

The Campus Plan does provide tables which indicate that the maximum bulk allowed will not be exceeded. However, that determination can only be able to be made during the second stage submissions when more exact data is available concerning building mass.

In a DC Court of Appeals 2003 lawsuit between George Washington University and the BZA, the Court stated that the Regulations are designed to ensure that "reasonable accommodations have been made between the university and its neighbors which does not interfere with the legitimate interests of the latter." (Glenbrook Rd. 605 A 2d at 32)³

² Prior to the year 2000 the BZA performed that special exception function.

³ DC Court of Appeals, 831 A 2d; 2003 D.C. App. LEXIS 553, GWU vs. DC BZA

This report identifies the impacts on the adjoining neighborhoods that approval of the Campus Plan would have if approved and implemented.

III. OTHER STATUTORY PLANNING GUIDANCE

DC Code Section 6-641.02 states:

“Zoning maps and regulations and amendments thereto, shall not be inconsistent with the comprehensive plan for the national capital, and the regulations shall be designed to lessen congestion in the street, to secure safety from fire, panic, and other dangers, to promote health and general welfare, to provide adequate light and air, to prevent the undue concentration of population and the overcrowding of land, and to promote such distribution of population and of the uses of land as would tend to create conditions favorable to health, safety, transportation, prosperity, protection of property, civic activity, and recreational, educational, and cultural opportunities, and as would tend to further economy and efficiency in the supply of public services. Such regulations shall be made with reasonable consideration, among other things, of the character of the respective district and their suitability for the uses provided in the regulations and with a view to encouraging stability of districts and land values therein.” (Emphasis added)

In addition to the review standards in the Regulations, the above stated purpose of zoning provides guidance to the Commission in considering the special exception application.

Section 492(e) (b) (1) of the District of Columbia Self-Government Reorganization Act of 1973, as amended, the Home Rule Act, states that “Zoning maps and regulations, and amendments thereto, shall not be inconsistent with the comprehensive plan for the National Capital.”

In deference to both of these statutes, the Commission, in approving a special exception, needs to find that the proposed zoning amendment, the special exception, will not be inconsistent with the Comprehensive Plan for the National Capital both District and Federal Elements. In addition the Zoning regulations state: “In reviewing and deciding a campus plan application..., the Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan.” (11 DCMR §210.7)

Due to the fact that the Campus is located in the Georgetown Historic District and possesses individually designated historic landmark buildings, both national and local historic landmark laws must also be complied with. The historic reviews, as a matter of practice, usually take place during the second stages of the special exception process requiring detailed architectural drawings and impacts on historic resources. However, a Campus Plan that proposes demolition of historic properties or is otherwise inconsistent with DC or Federal Historic Preservation laws could be rejected on that ground alone.

IV. BRIEF HISTORY OF PREVIOUS GU CAMPUS PLANS

The University was founded in 1789 as Georgetown College with 12 students and several professors. Since then, the University has grown into a well-respected major educational institution including undergraduate and graduate schools, an on-campus medical school and hospital, athletic facilities and an off-campus law school site with a Main Campus student enrollment of 14,033⁴ and University employees totaling between 8,000 and 9,000 persons⁵.

The University has submitted 10 Campus Plans, under the current regulations, since 1958. The campus boundaries were set in 1966 by the National Capital Planning Commission, when it was also the city planning agency⁶. **Appendix B**

As part of the 1973 application, BZA 10814, the campus boundaries expanded beyond the original campus, eastwardly along Prospect Street NW, to 35th street, NW, with the exclusion of the southern frontage of Square 1223 and bordered to the east by 35th Street NW, N Street, NW to 36th Street NW, to P Street NW, with the exclusion of the eastern frontage of Square 1248, and the property of the Sisters of Visitation.

The University requested this boundary extension to provide additional land for the development of its 1985 planned 10,000 full-time and special education enrollment.

The BZA approved the campus expansion, June 7th and December 12th, 1977, with conditions for Square 1226 limiting the number of residential accommodations on that Square.

In its 1982 Campus Plan, the University identified a land area, from 1977 to 1982, of 4,399,411 sq. ft. or 27,010 sq. ft. above the NCPC 4,372,401 sq. ft. limit. The boundaries were set in order for the University not to expand its use beyond the then campus gates and the three squares, to the east of 37th Street and one square to the east of 36th Street, which the University had already acquired. **The NCPC stipulated that within those four squares, outside the gates, the height of the buildings should be kept at 40 feet and encouraged the University to plan for future building developments more in the central part of the campus.** (Appendix B, NCPC May 1973 Transcript)

It is of historic planning significance that the University's "FACT SHEET" in the 1971 approved Plan indicated:

⁴ Exhibit K page 2, submitted 2010-2020 Campus Plan

⁵ Exhibit M submitted 2010-2020 Campus Plan. The draft Campus Plan employee figure exceeded 9,000.

⁶ Boundaries conform to the "General Land Use Objectives 1970/1985" element of the Comprehensive Plan for the National Capital.

*The University is dedicated toward the maintenance and enhancement of a smaller university of the highest quality. It is not interested in 'bigness' in numbers, buildings, or area.

*It does not need to acquire any additional property to implement the master plan. It is utilizing its own current property to its highest and best use as a university.

***Its growth has been set, as an outside limit to not exceed 10,000 students (exclusive of the Law Center), estimated to occur by 1981. The yield from its existing land (without any acquisition) under current regulations will handle the maximum 10,000 student campus. It may never reach 10,000 students nor is there a commitment to reach that maximum.** (Emphasis added)

*Its enrollment for 1970-71 was 6,501 total students, including the Medical Center and exclusive of the downtown Law Center.”

At the BZA hearings on Appeal #10814, the University stated that the fall 1973 total enrollment exclusive of the Law Center was 8,513 with a Faculty and staff of 4,407. (University letter 11/8/1973 to BZA, **Appendix C**)

The two most recently approved Plans are BZA application #15302, approved September 5, 1990, called the “Bicentennial” Plan and BZA application 16566 approved March 21, 2001, as amended February 3, 2006 (Order No. 16566-G), the current plan which expired on December 31, 2010.

As background to the BZA deliberations on the 1990 Plan, application #15302, the University’s Director of Public Relations was quoted in The New York Times, August 5, 1990, saying “**We will have a bed for each undergraduate. That is a commitment we are willing to make.**” (Campus Life: Georgetown: Neighbors Fight Student Housing Off Campus.) (Emphasis added)

In that “1990 Campus (Bicentennial) Plan” the University stated that they “relied heavily on past traditions and experiences...” and that that plan “builds upon the concepts contained in the eight previous plans approved by BZA.” (BZA order #15302 Finding of Fact 12.)

BZA Finding of Fact 20 provided a comparison between the 1983 and 1989 Plans, showing no change in the maximum 10,000 student level but increasing faculty and staff from 6,735 to 7,500, introducing visitors to the Medical Center from 1,579 to 2,100 (a 33% increase) and increasing the total person count from 18,314 to 19,600 (a 7% increase).

Finding of Fact 22 noted that “The Bicentennial Campus Plan places a high priority on the development of on-campus housing” and contains a commitment to provide 500 new beds on the campus by 1997 and rehabilitate/reconstruct 425 existing beds, contingent on financing and approval of the cogeneration facility.

Finding of Fact 24 states:

“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.**
(Emphasis added)
- b. To make a policy change to require all freshman students to live on campus beginning academic year 1991.
- c. To extend this requirement to sophomore students upon completion of dormitory rehabilitation and new construction.
- d. To move graduate students off-campus in order to accommodate incoming undergraduate students, until the new dorm beds are in place.
- e. To maintain the use of University-owned townhouses for undergraduate students.
- f. To commit to providing a total of 925 beds by the fall of 1997, contingent on the ability to finance...
- g. To implement a new program for off-campus affairs...to respond to the concerns expressed by the community.”
(Emphasis added)

The primary provisions of Finding of Fact 24, highlighted above, have never been implemented.

The BZA approved the University's proposed increase in traditional undergraduate enrollment of 340 full time equivalent (FTE) students and for the first time placed a cap on undergraduate enrollment of 5,627 FTE students.

The BZA conditions approving the 1990 Campus Plan required the University to adopt:

“a housing program that caps the increase in undergraduate enrollment to 340 FTE undergraduate students with a University commitment to provide new beds on campus, and a new Director of Off-Campus Student Affairs program. Further, any actual increase in undergraduate enrollment shall be conditioned upon and subject to the provision of the University of additional beds on campus to accommodate that increase... The number of new students admitted to the University pursuant to the authorized increase in enrollment shall not exceed the number of additional beds that the University shall have provided for occupancy

before the start of any academic semester. Further, until all freshman and sophomores live on campus, no students shall be admitted to the University pursuant to the authorized increase in enrollment.” (Condition 5 in BZA Order #15302.)

In the December 5, 2000 approval of the proposed Campus Plan, the BZA declined to approve the University’s request for an increase in undergraduate enrollment. The BZA stated in Preliminary Matters #43:

“The Board finds that the number of undergraduate students at the University’s campus is having an adverse impact on the surrounding neighborhood because of frequent occurrence of serious student misconduct off-campus and the displacement of permanent, non-student housing as a result of the lack of sufficient on-campus housing.”

The Board’s revised Order issued in 2003 granted the requested increase in enrollment because the Board, on remand from the Court of Appeals, concluded that the construction of 780 beds in the Southwest Quadrangle **and a new program aimed at improving the behavior of students living off campus would minimize any additional possible adverse impacts on the adjoining neighborhood. (Emphasis added)** The fact of the matter is very different as experienced in the neighborhood between 2000 and 2010.

In the 2000-2010 Campus Plan, the University initially proposed an increase of 500 undergraduates to raise the cap to 6,127. Based on community opposition to any increase in the undergraduate cap the University reduced its requested increase to 389 students. The original BZA Order did not approve any increase in the cap. However on remand from the Court of Appeals this was modified to grant the requested increase of 389 students **establishing the new cap at 6,016. The University’s 1990 pledge to house 100% of its undergraduate on campus as a long term goal was not included in the 2000 Campus Plan application or in the BZA Order. The revised BZA Order also permitted the University to count only “traditional full time undergraduates” requiring housing towards the revised cap and to average Fall and Spring enrollment to compute compliance with the cap. Since part time and “non-traditional” students were excluded from the cap and Spring undergraduate enrollment at the University is 10-15% lower than Fall enrollment, these changes to the 1990 Order effectively permitted the University to increase its Fall enrollment by hundreds of undergraduate students over and above the 389 student increase in the cap.**

Each of the Campus Plans mentioned and all of the other submitted and approved plans show substantial increase in campus activity and total persons on campus. Currently, the proposed increase in persons is projected to reach over 25,000. Without explanation, the University commitment, in 1989/1990, to the “long term goal” of “housing 100% of its undergraduate students on campus” is again not included in the Draft or Submitted Campus Plan.

The 2010-2020 Campus Plan will be the first time a GU Plan will be before this Commission for consideration since the Regulations were amended, transferring responsibility for review and approval of campus development plans, from BZA to the Commission. (ZC Order #932, December 8, 2000.)

V. PROVISIONS OF CURRENT AND PROPOSED CAMPUS PLANS WHICH ADVERSELY IMPACT ADJOINING NEIGHBORHOODS

There are four primary deficiencies in the current and proposed Campus Plans which impact the Burleith and West Georgetown neighborhoods. They are:

- the inadequate amount of undergraduate housing on Campus;
- the absence of any graduate housing on the main campus;
- the continuing increase in total number of students, faculty/staff and visitors each academic year; and
- the very limited and ineffectual student affairs remedies provided for off-campus students to the impacted neighborhoods.

The first three features of the Plans collectively contribute exponentially to the daily traffic volumes and campus parking requirements.

A. Number of students requiring housing.

Even though there is an existing cap on the number of undergraduate students that can be enrolled, this cap has been gerrymandered by the University by excluding so called “non-traditional” undergraduate students from the count and averaging the traditional undergraduate enrollment between the fall and spring semesters. The University’s emphasis on the fact that it is not requesting any further increase in the undergraduate cap in the proposed 2010-2020 Campus Plan fails to address the existing adverse impacts of the number and concentration of student rental housing in the immediately adjoining neighborhoods. **The University policy of not providing any additional on-campus housing for undergraduates clearly implies that the private housing market should accommodate the need for undergraduate housing off campus and the bulk of the graduate housing needs.** This policy creates what can be called an “induced demand”⁷ for student housing nearby.

With regards to the “non-traditional” undergraduates, the 650 enrolled in 2000 have grown to an average of 951 during the 2009-2010 academic year (an increase of 47%), and are projected to increase to an average of 1,055 by the year 2020⁸. The BZA has allowed the University to define these students as “part-time, non-degree, and non-traditional full-time students” (which the University defines as 2nd degree BSN students

⁷ Induced demand is the phenomenon that after student housing supply is limited or capped on campus, more housing is desired in the adjoining residential neighborhoods.

⁸ Exhibit B, Page 8, GU response to Ron Lewis information request, and GU data, Draft 2010-2020 Campus Plan, slide 19

who have returned to school, veterans, commuters living in Maryland and Virginia and students over 25 years of age). The assumption appears to be that none of these students will seek housing on or close to the University. **There is no evidence to substantiate that assumption in the Campus Plan.**

The earlier Draft Plan documented an increase in graduate students, from 3,560 in year 2000 to 5,545 in 2009 and projected to increase to 8,750 by the year 2020⁹ (a 58% increase). This represented a total headcount of 15,821. The filed Plan head count now proposed for 2020 is 16,133. All of these numbers represent academic activity increases on the campus, which will substantially increase the volumes of traffic on the already overloaded streets, particularly at rush hours. (Traffic impacts will be identified separately by Traffic/Transportation expert.)

In fact University data show that during the current school year (2010-2011), graduate enrollment increased by 13%, to 6,275 over the prior year. **The filed Plan indicates the 2010 IPEDS Graduate figure is even higher: 6,654.** In 2000 the University predicted that graduate enrollment would be no greater than 3,873 in 2010. (Office of Planning Supplemental Report)

The University's Plan projected enrollment numbers, from 2010 to the proposed year 2020 level, would increase over all student enrollments to over 16,100¹⁰, well above the 1983 & 1989 Plans of no more than 10,000. However the enrollment numbers are calculated, either by averaging or by the Integrated Post Secondary Education Statistics (IPEDS) now proposed, the proposed increase gives no priority to reducing/eliminating the existing University adverse impacts caused by the existing concentration of student off-campus housing in the surrounding neighborhoods.

Tables 1 & 2, on the following page, compare the enrollment numbers of the Draft Plan with the Submitted Plan.

⁹ Ibid, slide 19

¹⁰ Exhibit K, 2010-2020 Campus Plan, page 1, 16,133 and page 2, 16,871.

Table 1: On- Campus Enrollment & Approximate Employee/MedStar Headcount
GU Draft 2010-2020 Campus Plan, Nov. 18&19, 2009 (Slides 19-20-21&42)

	2009 Academic Year	Proposed Growth	Proposed Academic Year 2019-2020
Graduate & Professional Students	5,545	(+) 3,205	8,750
Full-Time Trad. Undergraduate (Average)	6,011	0	6,016
Non-Traditional Undergraduates (Average)	885	(+) 170	1,055
Employee Headcount	4,802	(+) 480	5,282
MedStar Employee Headcount	4,269	(+) 427	4,696
TOTALS	21,512	4,282	25,799

Table 2: On-Campus Enrollment & Approximate Employee/ MedStar Headcount
GU 2010-2020 campus Plan Filed Exhibits K, L & M

	2010 Academic Year	Proposed 2020 Academic Year	Increase by 2020
Graduate and Professional Students	6,654	9,458	+2,804
Traditional Undergraduate	6,652	6,675	+23
Non-Traditional Undergraduates	727	Excluded ¹¹	NA
Main Campus Student Headcount	14,033	16,133	+2,100
Approximate Employee Headcount	4,035 ¹²	4,438	+403
Approximate MedStar Headcount	4,269	4,696	+427
Total Campus Headcount	22,337	25,267	+2,930

The enrollment numbers in the submitted Campus Plan are somewhat higher than the Draft Plan numbers. Since the cap is an average, it is not possible to determine

¹¹ Students in non-degree programs, students in the School of Continuing Studies, and students returning for their second degree in Nursing would be treated as graduate students rather than undergraduates under the GU proposed campus plan.

¹² This number is now lower than indicated in the Draft Plan presumably because it does not include employed students, temporary employees, or employees of contractors or other non-university owned or controlled entities.

compliance without an entire year's data. **The actual Fall 2010 undergraduate enrollment is 6,130.**

The University now proposes to establish a "Traditional Undergraduate Program Headcount" (TUP) at 6,675¹³. **Although the derived TUP number is 6,652, as shown on page 3 of Exhibit L (a difference of 23),** the method of calculating it would permit the University to increase its "traditional undergraduate" enrollment significantly by reducing enrollment in certain categories of "non-traditional undergraduates" now included in the University's proposed undergraduate headcount cap.

The Plan not only does not address eliminating the existing adverse impacts caused by the concentration of student off-campus housing but it proposes significant increases in enrollment without providing any new student housing.

B. Graduate housing proposed in 1789 Block. NO LONGER IN SUBMITTED CAMPUS PLAN but relevant in the evolution of the submitted Campus Plan

The University proposed in the draft Plan to build 120 beds, with 80 underground parking spaces, for graduate students and/or faculty in the 1789 Block. (Five story mixed use buildings.) Although this square is technically within the campus boundaries, the square is part of the regular residential street grid pattern, and not within the main or central portion of the campus, where good planning policy directs any additional student housing should be located¹⁴. The proposal would have eliminated existing historic buildings that are now part of the fabric of the Georgetown Historic District. **Appendix U**

Locating a higher concentration of students at the edge of the campus, in addition to the existing undergraduate dormitories located nearby, establishes a housing density and intensification which is not in keeping with the adjacent lower scaled residentially zoned area.

The proposed Campus Plan does not provide any evidence to the effect that additional space is not available on campus for residential purposes, or that the Comprehensive Plan direction towards satellite campus options has been considered.¹⁵ In fact, at the May 30, 2009 Community meeting (Duke Ellington School of the Arts), the University's architects provided an "Options Phase Presentation-Final" document which identified at least three sites, on the main campus, which could accommodate about 141,000 sq. ft. of dormitories.¹⁶ **By proposing the graduate dormitory project at the eastern edge of the extended campus, the University chose to neglect opportunities to reduce the off-**

¹³ GU 2010-2020 Campus Plan Exhibit L, page 1, includes previously excluded part time students, veterans, commuters, students over 25 and students studying abroad.

¹⁴ In the 1973 campus boundary expansion beyond the original gates, NCPC stipulated and encouraged the University to plan for future building developments more in the central part of the campus. (NCPC May 1973 Transcript)

¹⁵ Section 3.2.5 Student Housing, 2010-2020 Campus Plan, page 13.

¹⁶ North residential, 66,000 sq. ft., South residential 5,000 sq. ft., & the Middle, 70,000 sq. ft. Cooper, Robertson & Partners May 30, 2009.

campus dormitory space demand and its adverse impacts on the adjoining neighborhoods.

C. What level of student housing do Georgetown University's peer institutions provide?

CAG commissioned planning consultant Shannon S. Christmas, MCP MIT, to prepare an undergraduate student housing survey comparing Georgetown University's student housing ratio to peer universities nationally. The survey report (**Appendix S-1**) is based on information compiled by US News and World Report: America's Best Colleges (2010) Edition. Mr. Christmas found that:

“Georgetown lags behind many of the University's national peers (in housing undergraduates). Georgetown University's self-reported percentage of undergraduates housed places the University squarely in the middle of the pack of peer institutions. More importantly, among Georgetown University's 'top 10 competitors' only three- University of Pennsylvania, Cornell University, and the University of Virginia- house fewer students in university housing...”

The comparison study shows that of the top ranked 35 Universities listed, Georgetown University ranks 23rd in housing up to 73% of its undergraduates. Appendix S-2&3

The study mentions that Georgetown University claims that it houses more undergraduates than the other local District of Columbia Universities. However, each neighborhood is different and contains unique characteristics. For example a neighborhood of large apartment buildings (as is the case near GW University) is quite different from the Georgetown and Burleith neighborhoods of small single family houses and the impact of a given number of students on the latter will be much higher than on the former.¹⁷

The study makes two basic points, **(1) GU compares poorly when compared with its peer institutions because it is not the residential college that it pledged in 1990 to become, and (2) literature and experience in Foggy Bottom indicate that when a university reaches the size of GU or GW it has negative impacts on the surrounding lower density communities.** This is especially true if the percentage of students housed on campus is significantly less than the total enrollment.

D. The George Washington University impacts on the Foggy Bottom residential neighborhood. A nearby cautionary saga.

As did Georgetown University, George Washington University (GW) submitted a 10-year Campus Plan in 2000. Although the neighborhoods and the specific zoning around

¹⁷ Public hearing testimony of DCOP Planning Director Andrew Altman Sept. 26, 2000

both institutions are different, there were and continue to be two unresolved but related neighborhood impact issues.

The April 21, 2000 OP report described these issues as:

1. the physical expansion of GW beyond the campus boundary in order to meet its university-owned housing needs, and
2. **the impact of students not in university-owned housing on nearby communities who put added pressure on the local housing market.** (Emphasis and underscoring added).

That report raised serious concerns about the number of students living outside the GW Campus.

“If GW continues to purchase land outside the campus plan area, and the number of students living in the Foggy Bottom community continues to increase, the residential community will reach a ‘tipping point’ where the Foggy Bottom community simply transforms into a ‘University area’.”¹⁸
(Emphasis added)

The report stressed that the **“impact is from the students not housed in University housing who live in the surrounding community...If this number becomes too large, the character of the community begins to change, and the area can become perceived as a largely transient community of students rather than a community with a significant number of more permanent residents.”¹⁹** (Emphasis added)

No specific criterion was provided as to when the character changing “tipping point” is reached. The September 26, 2000 testimony presented by the then Director of Planning²⁰ suggested that **“So you try to tailor our approach to each campus plan, and in the GWU case we have a situation of what we characterized in our first report as the tipping point.”** (Emphasis and underscoring added)

The Director explained further **“you have a neighborhood right now that is very fragile, very at risk, has suffered...through campus expansion to a point where it cannot really tolerate further impacts without losing the character and fabric of that neighborhood.”²¹** (Emphasis added)

The testimony shows further:

“That is the point at which it’s reached. In fact, it’s a point that may have already been exceeded and passed, that threshold, and so what we are trying to do now is to stop that and look at no further impacts, no new impacts on the George Washington University campus.” (Emphasis added)

¹⁸ BZA Case No. 16553, exhibit 138, page 2

¹⁹ Ibid, page 9

²⁰ BZA Case No. 16553, Sept. 26, 2000, page 181

²¹ Ibid, page 181

Applying this “losing the character and fabric of a neighborhood” tipping-point characterization to the current neighborhood conditions for Burleith and West Georgetown, University data indicates that in the Fall of 2009 a total of 2,327 students lived in Zip Code 20007 , with most (1,540 students or 66% of the 2,327 students) living in Georgetown and Burleith. **If one looks at the year 2000 concentration of students map for Burleith alone²², the Square closest to the University north of Reservoir Road between 37th and 38th streets contains 28 student rentals out of 33 existing homes on the Square or 84%.**

It appears that the character of those Squares changed from single family home ownership to transient student rentals during the last decade. The current student population is too large and threatens the stability and character of the neighborhood.

The lessons from the GWU expansion demonstrate that **the existing problems in Burleith and West Georgetown will only be compounded if additional students take up residency adjacent to Georgetown University.**

E. Literature search on student off-campus housing impacts on residential neighborhoods.

A literature and research study search was undertaken to determine what impacts off-campus student housing may have on one-family residential property values. The search found several studies, in this country and abroad, describing impacts of colleges on surrounding communities (See **Appendix N, R&T**) for a listing of relevant documents)

A very comprehensive 2009 Policy Focus report by the Lincoln Institute of Land Policy, entitled “Town-Gown Collaboration in Land Use and Development” states:

“Universities have entered into a new era of community engagement, but town-gown conflicts still exist- especially when institutions seek to expand at the campus edge... This policy focus report describes the evolving roles of colleges and universities in urban development; examines sources of tensions over land use and development decisions; and presents a variety of approaches that do and do not work in managing these conflicts. The report also offers several approaches to consider in designing successful collaborations among the universities, the city and the neighborhood.”

This report discusses the “Spillover Effects”, but does not identify when any imbalance may occur in a neighborhood. However it does mention community criticism for universities’ lack of plans to mitigate spillover effects. **Appendix O** provides the Institute’s summary of “What works? And what does not?”

Barbara Lukerman at the Center for Urban and Regional Affairs located in the University of Minnesota, in their fall 2007 CURA Reporter, lists examples of how other universities and their surrounding neighborhood have addressed tensions and conflicts and describes

²² Appendix E

her analysis of the University's impact on surrounding neighborhoods under four principal issues:

- (1) rapid conversion of owner-occupied housing to rental housing to serve student housing demand;
- (2) deteriorating conditions of the older housing stock;
- (3) over occupancy in the rental stock, with diminished livability because of inappropriate student behavior; and
- (4) crime and perceived personal safety considerations.

Any direct impact on property values was not considered in that study.

However, there are at least two studies that demonstrate rental externalities can have negative impacts on property values.

The most directly relevant empirical study of the impacts on property value, found to date, appeared in a September 1991 article in the Journal of Urban Economics.²³ Appendix P. The conclusions are stated as follows:

“This study demonstrates that an inverse relationship exists between the value of a house and the presence of rental properties in the study area. The evidence suggests that the housing maintenance model developed by Sweeney, which assumes an identical sales price function for both a rental property and an owner-occupied unit, should be modified to include differential sales price functions.

The accumulation of single-family rental properties in a residential neighborhood seems to have the same **negative impacts** as the intrusion of apartments or other types of undesired properties. This study demonstrates that there is perhaps a need for city planners, or others, to regulate the number of **single-family rental properties** in a given residential neighborhood. Home buyers, in search of residences, should also take this factor into consideration.” (Emphasis added)

The study found that if a house is surrounded by two rental properties and/or three rental properties, the selling price would decrease by \$1,344 (1991 dollars), approximately 2% of the price of a standard house. (Page 79, Appendix P includes the entire article and additional references.)

There is no reference to student occupancy of any of the single-family rental properties. However, the study authors indicated, if they had included student tensions/nuisances, the study probably would have found **additional depreciation of the property value.**

The second impact study is titled **“Factors Affecting Residential Property Values in a Small Historic Canadian University Town”** by John A. Janmaat, Economics, IK Barber School of Arts and Sciences, January 10, 2007, University of British Columbia Okanagan, and included peak sound level considerations. **Appendix Q**

²³ “The Impact of Rental Properties on the Value of Single-family Residences.” Ko Wang, Dept. of Finance, California State University, Fullerton CA. 92634.

The study abstract indicates that the town of Wolfville, Nova Scotia is a small historic community, economically dominated by Acadia University

“A set of sound level observations was used to generate average and peak sound level profiles for the town. Average and peak sound level, as well as presence of a view were included in a hedonic regression of property values. View and average sound level were not statistically related to home price. However, peak sound level is priced, with **a one decibel increase in reducing the average house price by about two percent**. Beyond conventional variables such as age and living space, the zoning classification of the property was found to be highly significant, with homes zoned for single-family residential only commanding the highest price. **Given the high population of student tenants in Wolfville**, tenants unlikely to live in areas zoned single family residential, **these results suggest that external externalities-either due to student tenants or landlord practices-are having a strong negative impact on property values.**” (Emphasis added)

The two studies, cited above, demonstrate that rentals and student rentals negatively impact one-family properties.

VI. LOCATIONS OF STUDENTS LIVING IN ZIP CODE 20007

As part of the off-campus student housing locations discussions during the public hearings on the 2000-2010 Campus Plan, the Office of Planning (OP) June 12, 2000 Report, indicated that based on University data:

“In (the) Spring (of) 2000, 84 percent of the undergraduate students living off-campus lived in Zip Code 20007 and 16 percent lived elsewhere in Washington, DC, Virginia or Maryland. The Office of Planning used those same percentages (84 and 16 percent) to show how students living off-campus might be distributed in Zip Code 20007 and elsewhere in the city and suburbs in 2003 and 2010 if the percentages remained the same.”

That exercise indicated a projection of 809 undergraduates living off campus in 2010. According to University data **the actual number of undergraduates living in Zip Code 20007 in the fall of 2009 was 1,195, a difference of 48%.**²⁴ OP qualified its analysis because “The actual number...could be lower or higher”. The actual University data highlights the difficulty of trying to project enrollment numbers on student housing choices within the private market.

The OP Report did offer, in their Attachment H, the following footnote:

“When the Southwest Quadrangle comes on-line, the 1,041 FT traditional students will be reduced by 780 leaving approximately 260 students in the

²⁴ The July 14, 2000 OP Supplemental Report warned that if the strong housing market declined and more students live off-campus, OP would consider over 900 undergraduates living in the Zip Code as a worst-case scenario that would require action by the University.

community. It is anticipated that the majority of these students will come from the neighborhoods of Burleith and West Georgetown.”

That assumption also did not come true. University data indicates a total of 1195 undergraduate students living in zip 20007, mostly in West Georgetown and Burleith²⁵.

GU data also indicates 1132 graduate students lived in Zip Code 20007 (Fall 2009), primarily in Georgetown, Burleith, Foxhall and Glover Park. (Campus Plan Presentation dated April 26, 2010, slide 19).

The 2009 total student enrollment living off campus within Zip Code 20007, immediately surrounding the GU Campus, amounted to 2,438, including the 111 undergraduates living in University owned townhouses in the community.

The OP Report, on Application #16566, page 20, expressed concern **“that the future increase of undergraduates, without any additional on-campus housing, could mean continuing negative impacts on nearby neighborhoods, especially Burleith and West Georgetown.”** The Report also stated **“... it would be somewhat counter-productive to see an improvement for several years and then see new negative impacts, essentially slipping backwards, as the University added 389 new undergraduate students, above the present cap.”**

University data shows that is what actually happened. The Southwest Quadrangle moved some of the off-campus undergraduates to on-campus. However, the units vacated in the community were re-filled by 2009.²⁶ Based on that experience, and without any additional on-campus undergraduate and graduate housing, the next ten years are likely to lead to a greater number of students living in the 20007 Zip Code²⁷. Even if there were no increase in undergraduate numbers, the induced demand for off campus housing near the University could lead to additional single family property conversions to student group rentals. In addition the University proposes a significant increase in graduate enrollment which is likely to have a significant housing and traffic impact on Burleith and Georgetown.

The University’s 2010-2020 Campus Plan claim of an enrollment increase only in graduate students and no increase in undergraduates, does not address or resolve or reduce the volume of the existing student population living in group housing in the immediate neighborhoods with their continued negative impacts.

²⁵ GU Data Analysis- Housing, April 26, 2010 community meeting presentation/11.

²⁶ In the spring of 2000, 1,243 traditional undergraduates lived in private homes in Zip Code 20007 (OP Report dated July 17, 2000.) In 2004, after SW Quad was built, 759 traditional undergraduates lived in private homes in zip code 20007. That figure increased in the fall of 2009 to 1,195. (GU Campus Plan website, April 26, 2010 community presentation slide 11). Adding the 111 undergraduates living in GU owned housing off-campus raises the fall 2009 total to 1,306, more students than were living off campus in 2000.

²⁷ In 2010, 9 of the 22 homes were student occupied comprising 40% of the 1900 block of 38th Street (Burleith survey, **Appendix D-2**).

The Burleith Survey, **Appendix D-2**, found 165 units, 31% of the total Burleith housing stock accommodating students. The concentration of students in this neighborhood has caused the character of this one-family residential area to become one of transiency. (18 of the total of 535 units were not surveyed in 2010 due to lack of response so the student housing percentages may be higher than 31 %.)

A CAG 2009 analysis **Appendix F** of student addresses in the GU Campus Directory 2009-2010 and other sources indicates 174 individual student addresses in Burleith. The CAG actual student address locations analysis corroborates the Burleith 97% house-to-house survey.

In 2000, the Burleith Survey found 114 of 535 houses were occupied by undergraduate students compared with 127 undergraduate houses in 2010, an 11% increase. While graduate houses were not surveyed in 2000, GU graduate housing data suggest graduate rental housing increased from 54 in 2000 to 66 houses in 2010, an increase of 22%. Total student houses in Burleith thus increased from 168 in 2000 to 181 in 2010, indicating about 13 houses were converted from residential to rental use. (**Appendix D-3**) **This continued increase in student rental units was the concern DC OP expressed in its Report on the University's Campus Plan Application during the year 2000.**

The Burleith analysis of 2020 projected enrollment numbers, Appendix D-1, forecasts 109 additional housing conversions in Zip Code 20007, assuming an average of 3 students per unit. That translates to 36 additional home conversions to student rentals in Burleith and West Georgetown combined by 2020 (Appendix D-1).

Adding the University's 2020 projected graduate number of additional students, 1,380 excluding continuing studies, the worst case scenario could be that all new graduates would choose to locate in Zip Code 20007 and more particularly in the Burleith and Georgetown neighborhoods. This will probably not happen.

What may happen, short of the University requiring all new graduate students to live outside of Zip Code 20007, is that, applying the current 24% of the total graduate students living in Burleith and Georgetown (Burleith analysis of enrollment numbers by Neighborhood, **Appendix D-1**), an additional 227 graduate students of the proposed 2,100 student increase will seek housing in these two neighborhoods.

Regardless of the specific enrollment number additions, whether graduate or undergraduate and considering the number of additional employees, (Med Star 427 & University employees 403 members)²⁸, the impacts on the neighborhoods immediately adjacent to the University, will only intensify. These adverse impacts the neighborhood, zoned for low-density residential home ownership, would have to absorb, with additional traffic and demand for parking, will further affect and change the character of the adjoining neighborhoods.

²⁸ Exhibit M, GU 2010-2020 Campus Plan.

It would benefit the students, the University and the adjoining neighborhoods if a much larger proportion of undergraduates lived on campus. The current policy only requires freshmen and sophomores to reside on campus.

The University asserts that graduate students are more mature and implies that they do not provide misconduct incidences to the extent that undergraduates do. That may be true for some of the graduate students. However, **graduate students do keep different hours than families and they do participate in loud late night parties which disturb adjoining family homes and intensify the nightly parking problem. They are also part of the induced demand for poorly maintained investor owned group housing²⁹ that is destabilizing the adjoining single family owner occupied residential neighborhoods.**

Section 4.1.2 of the Campus Plan indicates that a benefit of this plan is the University's willingness to "identify and pursue opportunities to establish satellite locations for some of the continuing studies programs". Based on the history of the previous GU Campus Plans this effort should have been undertaken much earlier. This pursuit is now based on allowing "growth and new audiences" not on how any satellite campus would reduce the existing impacts of off-campus housing.

VII. LOCATIONS OF STUDENT OFF-CAMPUS MISCONDUCT AND OTHER NEGATIVE/ADVERSE IMPACT(S) ON ONE-FAMILY ZONED AREAS

The current and past University policies on building additional on-campus student housing, have produced severe neighborhood impacts as a result of the volume of off-campus housing required by the increasing number of enrolled students.

The West Georgetown and Burleith communities are severely adversely impacted by the quantity and quality of the many student group-homes,³⁰ the noise generated by loud students at many late night parties, binge drinking and alcohol-fueled disorderly students, public urination, vandalism, student fights, trash on private and public areas creating blight conditions, and unsafe and unsightly housing caused by the poorly maintained property of absentee landlords. **Collectively and individually these objectionable conditions adversely impact the quality of life and living in Burleith and West Georgetown.**^{31/32}

²⁹ 3636 T St. NW, & 1431 36 St. NW, are examples of poorly maintained, student occupied, investor property.

³⁰ CAG Group Home definition. Housing units occupied with between 3 & 6 students.

³¹ On Oct. 22, 2004, Thehoya.com reported "Fire Inspectors Evict 43 Students.

³² November 2, 2006, the Georgetown Voice reported that six girls in the 3300 block of Prospect St. "pay a total of \$6,000 per month for the house, which is managed by Student Housing Association.

These near campus neighborhood conditions are present elsewhere and have been studied in “Town versus Gown: The Effect of a College on Housing Prices and the Tax Base.”³³ That study indicates:

“Colleges are not only bastions of knowledge and culture; however, college students have a reputation for loud parties and at times, drunk and disorderly conduct. This reputation makes areas near some colleges into recreational Mecca’s for people of college age, including many who are not students...Even during business hours, traffic and parking issues typically arise in municipalities from student ownership of vehicles...Together these nuisance factors potentially offset the value of the existing and future amenities these towns offer.”

The continued influx of Georgetown University students each year, which is sometimes called “studentification”, alters the existing low-density residential character of Georgetown and Burleith and affects the stability of those neighborhoods.

Examples of impacts:

A. 911 Disorderly Phone calls³⁴ (Appendix G)

Appendix G³⁵ illustrates the higher than average number of phone calls to the Metropolitan Washington Police Department, concerning disorderly conduct and excessive noise complaints, in the areas north and east of the University Campus with a high concentration of group/rental homes.

- 911 Phone calls located by street address, concerning disorderly conduct, destruction/damage of property and possession of open liquor container amounted to 477 calls during 2009.
- In Burleith alone, there were on average 5-6 disorderly conduct calls per weekend.³⁶
- When mapping disorderly conduct calls by street locations, it is evident that group home locations closest to the Campus generate the greatest number of calls. See **Appendix H**
- The mapped data shows how:
 - calls in north-south residential streets increase dramatically as one gets closer to the University

³³ Vandegrift, Donald & Lockshiss, Amanda & Lar, Michael/L, 2009. MPRA Paper 18998, U. Munich, Germany.

³⁴ MPD records of 911 calls related to disorderly conduct, destruction of property/damage of property and possession of open container.

³⁵ Data displayed by street location on CAG prepared electronic maps using MPD published crime website data for 2000-2009.

³⁶ DC Law on drunk & disorderly conduct. Any person “with intent to provoke a breach of the peace...shall be fined no more than \$250 or imprisoned not more than 90 days, or both.”

- calls by street for the 3500 Block (35th Street) shows the largest number of calls on O Street, which has an extremely high concentration of students (107 calls).
- calls by street for the 3300 Block (33rd Street) are clustered near Prospect Street which relates to the high concentration of student housing (73 calls). This concentration demonstrates that the 35th & O Street cluster is not an isolated occurrence.
- calls logged for the 3700 block are mostly clustered on the R, S and T Streets in Burleith which relate to the concentration of student housing mapped for that area (95 & 52 calls respectively).

To provide a sense of daily incidents adversely affecting the neighborhood quality of life, during the four months between September and December 2009, there was an average of 78 calls per month.³⁷

B. Other objectionable conditions adversely affecting the health and quality of life.

Trash violations abound in the off-campus student housing concentrations. There is photographic evidence at student housing addresses and data on the complaints called to the DC Dept of Health. As a specific example, during the 2009 September to December period, complaints were made on an average of 41 per month.³⁸ See **Appendix I**

It is not necessary to describe the impact on health and rodent control that the open trash containers and general trash placed outside residential buildings can and do cause. The implications are generally known by the resident public and property owners.

However, it has been observed that after a party student's trash is placed outside the buildings, whether or not it is a District trash pick-up day. Trash remaining on the property or public sidewalk causes health and pedestrian circulation problems. Not all such conditions can be directly traced to students. However, a review of the concentration of student off-campus addresses indicates that there is greater number of trash incidents and/or accumulation at those locations, than at none-student addresses.

The issue needs to be addressed by the property owners, the students, the University and the City agency responsible for trash pick-up. There have been attempts to do so. Nevertheless, the problem persists adversely affecting the health and general welfare of the community. The impact on the community and the District's sanitation resources is significant. Since this objectionable condition is the direct result of the University's

³⁷ 63 complaints to gtown411@ymail.com; 117 911 disorderly calls; 9 arrests and 123 OCSL sanction, violations. (That was included in the all time high number of complaints, from May '09 to March '10, of 525 complaints to gtown411@ymail.com and 1,650 911 disorderly calls during calendar year 2009.

³⁸ 108 complaints to gtown411@ymail.com; 14 trash citations and 42 trash fines to OCSL.

failure to provide adequate housing on campus and to deal with the behavior of its students living off campus, the Campus Plan needs to address the issue.

C. Magis Row

Magis Row is a group of row houses on the west side of 36th Street, south of O Street NW, owned by the University for some time, and operating as an undergraduate dormitory within the neighborhood outside the official Campus boundaries. The Magis Row townhouses used as dormitories significantly disrupt the lives of property owners and residents adjacent and across the street from these University properties.

It is also reported, that during past separate summer sessions, the University placed undergraduates that do not qualify as Magis Row students in these properties resulting in up to 120 additional transient students living in these rather tiny row house properties.³⁹

Representatives of the community have been discussing this situation with the University and have requested that undergraduate students not be housed in this row house environment and be replaced with adult residents-faculty, administrators, Jesuits or possibly graduate students. So far no positive action has been taken by the University as the Campus Plan makes no mention or proposals concerning this long-standing adverse condition.

Appendix J, provided by Magis Row neighbors, illustrates additional specific existing and long-term conditions, and documents complaints to the University about the adverse impacts along the 1400 block of 36th Street, Magis Row.

General conclusions regarding identified adverse impacts.

The CAG and the BCA have specifically documented and will present direct testimony at the Commission's public hearing regarding **the daily adverse impacts produced by the volume of undergraduate students living off-campus**. The data, tables, charts, graphics and several complete presentations I have reviewed, have all been carefully prepared and clearly document the **cumulative adverse impacts** created by the concentration of students living in residential ownership properties converted to group homes and dormitory style-living.

Video tapes, providing visual evidence, are also available demonstrating student conduct.

D. Impact on property values

Without a costly economic housing value analysis, and due to the current downturn in the general economy which has stabilized/reduced property values in most parts of the District, it is not possible to clearly demonstrate that the identified impacts have also impacted or reduced property values. Nevertheless, there are several "Town Gown"

³⁹**Appendix H** contains summer 2009 examples of complaints for the 1400 block of 36th St. Magis Row.

housing impact studies and specific studies of the impact of rental properties on the value of one-family residences. These are described in Section V. E of this report and referenced in **Appendix P & Q**.

The two off-campus housing impact studies cited indicate that student-off campus housing can reduce one-family housing values due to the transient rental nature of the student housing.

VIII. DOES THE CAMPUS PLAN MEET THE REGULATORY STANDARDS ESTABLISHED FOR COLLEGE AND UNIVERSITY SPECIAL EXCEPTIONS IN AN (R-3) ZONE?

The standards for College and University Special Exceptions approval are stipulated in Z.R. 3035.4 and specified in section 210 of the Regulations.

As mentioned in Section II, Special Exception applications for College or University Campus Plans require the institution to demonstrate that its use as a University is **“not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions”** (Emphasis added) (Z.R. Sec. 210.2). Noise, traffic, number of students or other objectionable conditions are the primary regulatory standards which proposals in the Campus Plan must meet.⁴⁰ There is also a maximum bulk requirement with the intent of preventing unreasonable campus expansion into improved low-density districts. **The Regulations also state: “In reviewing and deciding a campus plan application..., the Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan.” (11 DCMR §210.7)**

In addition there is another regulatory standard, Section 6-641.02 of the DC Code, which states that amendments to the zoning map shall not be inconsistent with the Comprehensive Plan for the National Capital. (See Section X)

In its review and decision on the Special Exception, the Zoning Commission for the District of Columbia must make a determination as to whether or not the University has demonstrated that its plan will not be come objectionable to neighboring property based on the evidence presented at the public hearing(s).

I have been asked by CAG and BCA to provide my expert opinion as to whether the Campus Plan proposals available at this date from the GU website satisfies the above criteria, based on my professional knowledge of the University’s planning history, review of previous zoning orders, my study of the current existing conditions in the Burleith and Georgetown neighborhoods adjoining the University and independent research on other

⁴⁰ As a prerequisite to requesting a special exception the applicant must submit a plan for the development of the campus as a whole, showing the location, height, and bulk of all present and proposed improvements, including a description of all activities conducted or to be conducted on the campus, and of the capacity of all present and proposed campus development. (ZR Sec. 210.4 (a), (b), (c), (d)) The Plan does not adequately indicate the capacity of all present and future buildings and screening, signs, and public utility facilities.

adverse or objectionable conditions that the implementation of the Campus Plan could generate.

As described in some detail in the several sections of this report, in my opinion certain **Campus Plan proposals, if approved, will become objectionable to neighboring property and thereby not meet the regulatory standards** due to the following:

- the proposed **total number of students, faculty and staff**;
- the existing **number of students** already living within Burleith and West Georgetown and the absence of University policy addressing the existing adverse impact these off-campus students exert on the neighborhoods;
- the **absence of additional undergraduate housing on campus**;
- the existing **traffic and parking levels**, studied and documented by the CAG traffic expert;
- the level of **disorderly conduct of students** living within and visiting the immediate campus neighborhoods, including frequent late hour excessive noisy parties disturbing adjoining homeowners and the above average “911 calls” to police, concerning complaints of disturbing the neighborhood peace; and
- **public health abuses and sidewalk obstructions** from trash violations on residential blocks with a high concentration of students.

IX. COMPREHENSIVE PLAN POLICIES RELEVANT TO THE PLANNING OF GEORGETOWN UNIVERSITY CAMPUS AND THE ADJOINING NEIGHBORHOODS

The Comprehensive Plan for the National Capital-District Elements (Comp. Plan) is divided into three volumes. **Volume I covers City Wide Elements** including general goal statements and policies for Institutional Uses **Volume II covers Area Elements** including the policy focus for the Near Northwest which includes Georgetown and Burleith. **Volume III is the Implementation Element**, which describes how the policies and actions in the Comp. Plan should be carried out.

The identification of relevant policies are listed in the same sequence as they appear in the Comp. Plan and follow the same level of consideration from the more general to the more specific,

The most relevant Comp. Plan statements and policies for the review of the Campus Plan, with which the Campus Plan “shall not be inconsistent with”, are as follows:

City Wide Element

In the LU-3.2 Land Use Element, the Institutional Uses Section 315 includes 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)
(Emphasis added)

In this land use Element, there are policies encouraging institutions to mitigate traffic and parking impacts (315.6); support good “corporate citizenship” among the city’s large institutions (315.7); and **ensure that institutional uses within residential areas “are planned, designed, and managed in a way that minimizes objectionable impacts on adjacent communities.”** (315.8) (Emphasis added)

In the Educational Facilities Element (section 1200), the plan indicates three “crucial educational facilities issues facing the District of Columbia” among which is:

- Encouraging university satellite campuses east of the Anacostia River to provide expanded educational opportunities. (1200.2)

The Element at EDU-3.3, Colleges, Universities, and Neighborhoods, section 1214.1 recognizes the Burleith and West Georgetown problems indicating that **“Neighborhood concerns relate to impacts such as traffic and parking and to broader issues about the changing character of communities where universities are located or expanding.”** (1214.1) (Emphasis added)

The Element at EDU-3.3 also states:

“Looking forward, the development of satellite campuses is strongly encouraged to relieve growth pressure around existing campuses...Continued efforts to improve the campus planning process and promote an open dialogue between the colleges and the neighborhoods around should be strongly supported.” (1214.4)

On pages 12-22 and 12-23 there are specific policies dealing with University Campus Planning. **Those that apply to Burleith and West Georgetown are:**

Policy EDU-3.3.1: Satellite Campuses

“Promote the development of satellite campuses to accommodate university growth, **relieve growth pressure on neighborhoods adjacent to existing campuses**, spur economic development and revitalization in neighborhoods lagging in market activity, and create additional lifelong learning opportunities for DC residents.” (1214.5) (Emphasis added)

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.”** (1214.6) (Emphasis added)

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.” (1214.8)

Policy EDU-3.3.5: Transportation Impacts of Colleges and Universities

“Support ongoing efforts by college 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.” (1214.9)

This Element also provides an Action EDU-3.3.A: proposal, which is listed for action in the implementation section of the Comp. Plan. LU-2.3.A: Zoning Changes to Reduce Land Use Conflicts in Residential Zones. (Page 25-21) The LU-2.3.A: provision includes guidance to **“ensure that there will not be a proliferation of transient accommodations in any one neighborhood.”** (Emphasis added)

Chapter 21 contains the Area Element covering the Near Northwest Policy Focus Area 2.4, including Georgetown and Burleith. (2100.3)

The Overview for this Section states **“The most significant challenge** facing the Near Northwest Planning Area (**Appendix K**) **is retaining the physical and social fabric of the community in the face of intense economic pressure.”** (2100.9) (Emphasis added)

The Area Element points out that “Institutional uses, including Georgetown University and George Washington University, comprise 11 percent of the Planning Area. (2102.5) it also identifies that “Foggy Bottom residents remain apprehensive about the impacts of university expansion on housing and neighborhood character.” (2107.2 b) The Area Element further points out at (2107.2 j) that “Expansion of institutional uses and non-profit organizations is an issue both for the community and the institutions themselves.”

In discussing the expansion issues, the Area Element points out those workshop participants emphasized **“the need to assess institutional impacts on a cumulative, rather than incremental, basis.”** (2107.2 j) (Emphasis added)

The planning direction for Burleith and Georgetown is expressed in the Area Element **Policy NNW-1.1.1: Residential Neighborhoods** which states:

“Maintain and enhance the historic, architecturally distinct mixed density character of Near Northwest residential neighborhoods, including Burleith, Georgetown, and Foggy Bottom... (2108.2) Emphasis added

Area Element Policy NNW-1.1.8 deals with **Student Housing in Burleigh and Georgetown**. This policy reinforces **EDU-3.3.4**: and states: **“Support and promote efforts by the area’s universities to develop on-campus dormitories in order to reduce pressure on housing in nearby neighborhoods.”** (2108.9) Emphasis and underscoring added

Although a “General Policy”, this policy provides direction to Universities, including Georgetown, to develop on-campus dormitories to reduce the conversion pressure on home ownership to rental units in both Burleigh and Georgetown. **When the Commission considers the new Campus Plan, it needs to address this Policy in particular, and several other Comprehensive Plan policies dealing with student dormitories.**

In addition to the above listed Comprehensive Plan policies, there are related policies in the **Implementation Section of the Plan**, Volume 3, and Chapter 25, which also lists the responsible agency/agencies for taking the action.

The relevant Implementation policies are:

Policy IM-1.1.1: Mitigation of Development Impacts

“To the greatest extent feasible, use the development review process to ensure that impacts on neighborhood stability, traffic, parking and environmental quality are assessed and adequately mitigated.” (2502.5) (Emphasis and underscoring added)

Policy IM-1.1.5: Development Approvals and the Comprehensive Plan

“To the extent they are relevant, consider the goals and policies of the District Elements in the approval of...campus plans, special exceptions...requiring review.” (2502.9) (Emphasis added)

Policy IM-1.3.3: Consultation of Comprehensive Plan in Zoning Decisions

“Require...the Zoning Commission...regulating land use to look to the District Elements of the Comprehensive Plan and its accompanying Maps. (Emphasis added)

Policy IM-1.4.2: Monitoring Neighborhood Trends

“Monitor social, economic, community, and real estate trends that might require land use actions or policy modifications.” (Emphasis added)

X. IS THE CAMPUS PLAN, 2010-2020, IN COMPLIANCE WITH THE DISTRICT ELEMENTS OF THE COMPREHENSIVE PLAN FOR THE NATIONAL CAPITAL?

The Home Rule Act does not provide any specific standards as to how to measure that “Zoning shall not be inconsistent with the Comprehensive Plan.” (Act Sec. 492 & DC Code Sec 6-641.02).

The District Elements of the Comp. Plan have been adopted, by ordinance, by the Council of the District of Columbia and signed by the Mayor, submitted to the National Capital Planning Commission “for comment and review” and sent to the Congress of the U.S. for a thirty day lay-over consideration. Due to this unusually formal process, (other cities’ Comprehensive Plans are usually adopted by resolution of the planning agency only and sometimes by the elected City Council), **the Districts Elements are considered law.**

The interpretation practice has been at both the Zoning Commission, via the Director of the Office of Planning recommendations, and at the National Capital Planning Commission, via the Executive Director’s recommendations, **to consider all the relevant goal/objective statements and stated policies, general and specific, consider the relevant land use and other policy maps and balance them, giving greater weight to the land use policy map if the general text statement or policy differ.**

Additionally, in its reports to the Commission, the Office of Planning always states that “one of the legislatively stipulated purposes of the Comprehensive Plan is to “[g]uide **executive and legislative decisions on matters affecting the District and its citizens** [.]”⁴¹ (Emphasis added)

Approving the Campus Plan, as presently constituted, **would be contrary** to numerous Comp. Plan policies and statements, the most important of which are *Area Element Policy NNW-1.1.8 dealing with student housing in Burleith and Georgetown, and Policy EDU-3.3.4 dealing with development of on-campus dormitories in order to reduce the pressure on housing in nearby neighborhoods.*

The Comp. Plan policies and statements enumerated in Section IX of this report and **Appendix L & M** designate Burleith and Georgetown as “conservation areas” and “low density residential” and therefore **provide the land use map basis for disapproval of the Special Exception application until the Campus Plan is revised to avoid any adverse impacts on the adjoining neighborhoods and the violation of planning policies in the Comprehensive Plan.**

XI. PROPOSED LOOP ROAD, WESTERN EDGE OF CAMPUS

The transportation portion of the Campus Plan proposes a “Loop Road” for GUTS shuttle service, for faculty, staff, students, patients, and visitor, in the central and western

⁴¹ Sec. 1-245(b)(2), DC Code

portions of the campus. The short-term service would connect the loop road to Canal Road, and in the longer term, connect to Reservoir Road.

Potential adverse impacts, from this proposal, relate to traffic and turning movements, any possible environmental impacts of the western leg of the loop on Glover Archbold Park, noise and light pollution and visibility, day and/or night, from across the Park on residential Foxhall Village.

The Campus Plan does not provide any data as to the number of vehicles that would circulate on this loop road and/or the hours of operation. The plan shows the general location of the loop road but gives no information as to its width and any lighting or other requirements.

The concept of better north-south circulation on campus and better use of the Canal Road entrance is good. It would enhance vehicular flow. However other options within the campus for the location of the road should be considered. Furthermore if and when both ends of the loop road are connected to the south at Canal Road, and on the north to Reservoir Road, **it will be essential to restrict vehicle traffic to GUTS vehicles only. Any possibility of “cut through” traffic from Canal Road and/or Reservoir Road must be controlled. This has been a long standing** community concern. There is no mention of this needed restriction in the Campus Plan.

At the time when more specific location and construction information becomes available about a loop road or other north-south traffic flow improvements, adverse impacts, if any, can be determined.

XII. CONCLUSIONS

1. The past Campus Plan approvals have only dealt with incremental building proposals on the Campus during the next ten years. Undergraduate student enrollment has been capped but allowed to increase every ten years.
Reducing/eliminating the concentration of both undergraduate and graduate students and student housing in the communities adjoining the University, has not been given the priority and emphasis required.
2. The planning and development history of the University and the transcripts of the public hearings indicate that major adverse impacts on the adjoining neighborhoods, have been and continue to be generated by the number and concentration of students living near and immediately adjacent to the University, as well as the increase in automobile traffic and parking related to the number of students, employees and visitors driving to and from the Campus.
3. The Zoning Commission needs to take a broader/stricter interpretation of **the provisions and intent** of the Regulations, and address the long standing objections and **cumulative** adverse impacts on those adjacent one-family residential neighborhoods created under previous Campus Plans and the student increase now proposed.

4. The proposed Campus Plan does not provide any documented evidence indicating that the proposed increase in total student levels, increase in employment levels and other on-campus activities, will not overcrowd the campus. The Campus Plan focuses on individual activities or programs and does not provide an assessment of the cumulative impact(s) of all academic, athletic, medical and other on-campus programs and activities as they will relate to and impact the surrounding neighborhoods. (See Table 1 & 2, On-Campus Enrollment & Total Employee/ MedStar Headcount)
5. University's current policy approach of declining to provide any additional undergraduate housing on campus and expanding enrollment by an additional 2,804⁴² by the year 2020, and proposing a cap of 6,654 traditional undergraduates **(636 more than the current undergraduate cap)**,⁴³ continues and intensifies the neighborhood student housing demand. The total enrollment by 2020 is projected to be 16,100 (IPEDS) as compared to 12,441 in 2009.⁴⁴ Adding in the faculty and staff increases proposed for 2020, the total population of the Campus would exceed 25,000 persons. **This total population will produce more traffic and parking demand and more off-campus student housing demand, which in turn will contribute further to the other identified objectionable conditions.**
6. The University has to look at its Campus Plan not just from the narrow confines of the campus itself. Rather, the proposals in the Campus Plan need to be drafted in the context of the neighborhoods within which it is located.
7. **The requested increase in enrollment will further increase transiency in Georgetown and Burleigh which violates Comprehensive Plan policies, among which is "relieving growth pressures on neighborhoods adjacent to existing campuses." Policy EDU-3.3.1 (1214.5)**
8. **Adding to the campus the entire continuing education student body now attending school in rented space in Clarendon, Virginia, increasing the graduate enrollment, and rebuilding/enhancing the medical facilities and other improvements and construction previously approved, plus additional faculty and staff, will greatly increase the total population and vehicle density. The Campus Plan intensifies the various activities on campus to the overcrowding level. Furthermore, without providing additional undergraduate housing on-campus, or at a satellite campus location⁴⁵, the several development policies reflected in the physical proposals of the Campus Plan, will continue to adversely impact the adjoining neighborhoods of West Georgetown and Burleigh.**

⁴² Graduate increase under Main Campus TUP Headcount, Plan Exhibits K & L.

⁴³ Proposed undergraduate headcount by 2020, Exhibit L, page 1.

⁴⁴ GU 2010-2020 Draft Campus Plan, April 26, 2010 presentation, slide 19. **This is a 29% increase and comes on top of the 13% increase in graduate enrollment that occurred in the 2009-2010 academic year.**

⁴⁵ The Regulation allow as a matter-of-right university uses in commercial zones.

9. Prior BZA Campus Plan orders have inadequately provided for reducing/eliminating the adverse impacts of **the misbehavior of students off-campus or the adverse impacts on the neighborhood character due to the transient nature of college/university student life.**
10. Although an undergraduate cap has been in place since 1990, the BZA has allowed the method of calculating the number of undergraduates, as requested by the University, to be based on an average number of students (averaging the fall and the spring enrollment) to lower the accounting number for the cap. The BZA did not place limits on the ability of the University to increase the graduate student level, and the faculty/staff employee level. The cap on the number of undergraduate student enrolled and the off-campus student life initiatives have been ineffective. **The cap has not reduced the number of students living within the immediate vicinity of the campus boundaries.**
11. The IPEDS Campus Student Headcount method of counting enrollment may be a superior method of counting students compared to the current averaging method. However the method does not address the magnitude of the continuing total enrollment on the Main Campus, or the need for reducing the existing adverse conditions caused by off-campus student housing. **The Main Campus enrollment numbers and other activities collectively are too high.**
12. The evidence, collected by CAG and BCA, **dealing with noise, traffic, numbers of students and other objectionable conditions**, demonstrates the various objectionable conditions caused by the density of off-campus student housing, which makes living adjacent to such group housing undesirable and affects the quality of life and may eventually affect property values adversely if it has not already done so.
13. The proposed Plan increase in graduate students would add to transiency and negatively impact the existing traffic and parking conditions in the neighborhoods.
14. Both the University's enrollment and the neighborhood survey data attached provide the basis to conclude that the Burleith and West Georgetown neighborhoods have already been negatively impacted by the concentration of student housing in those communities. The intent and purpose of the R-3 zoning classification for the area, is for one-family homeownership, and quiet residential housing. **The concentrations of student housing has altered the home ownership character of these neighborhoods to transient conditions which adversely impacts the quality of life daily.**
15. The two studies of student housing impacts, cited in the literature search section and attached as **Appendices N&O**, demonstrate that rentals and student rentals can negatively impact the value of one-family properties.
16. If additional transient students (both undergraduates and graduates) occupy Burleith and Georgetown, because they do not have the opportunity to live on-campus or at a satellite campus, the existing problems will only be compounded **thereby violating the specific Comprehensive Plan Educational Facilities**

Element policy of “relieving growth pressures on neighborhoods adjacent to existing campuses.” (1214.5)

17. Among other purposes, the zoning regulations are intended to “prevent the undue concentration of population and the overcrowding of land.”⁴⁶ The proposed total student and faculty/staff population intended to be accommodated on Campus, over 25,000 persons, appears to overcrowd the Campus and the D/R-3 Zoning classification.
18. The University has a history and experience with a satellite campus, its downtown Law School. “Committing to investigate the possibility of relocating the School of Continuing studies...”⁴⁷ is laudable but not sufficient nor a mandate. It does not address reducing the existing adverse impacts. A satellite campus would be a matter-of-right in a high-density commercial area and not subject to zoning review.
19. The character of the Burleith and West Georgetown neighborhoods has not completely changed to student transiency. Nevertheless, they cannot tolerate additional conversions without completely losing the character and fabric of the historic district as contemplated in the existing R-3 zoning. The OP 2000 “tipping point” characterization has been reached as described for the Burleith neighborhood where over 30% of the one family houses are now student rental units.
20. The Submitted Campus Plan does not meet the **regulatory standards of not becoming objectionable to neighboring property due to:** total number of students; the total number of students living off-campus; the absence of additional undergraduate housing on campus; the absence of any graduate housing; the magnitude of disorderly conduct of students living off-campus; the student generated 911 calls and public health abuses; and the existing and increased traffic and parking levels produced by the increased student enrollment. Accordingly the Plan should not be approved as presented because use as a University has become objectionable to neighboring property because of noise, traffic, number of students, and other objectionable conditions in violation of the Zoning Regulations (11 DCMR §210.2). The Plan does nothing to mitigate current objectionable conditions and instead proposes to exacerbate the objectionable conditions created under the past Plan. Special exception approval also should be denied because the Plan would “tend to affect adversely the use of neighboring property” in violation of the Zoning Regulations (11 DCMR §3104).
21. **The Campus Plan should not be approved as presented because the Home Rule Act requires that “Zoning maps and regulations and amendments thereto, shall not be inconsistent with the Comprehensive Plan.” (DC Code section 6-641.02)**

⁴⁶ DC Code Section 6-641.02, and Z.R. Sec. 101.1, (b&c).

⁴⁷ Section 2.1, page 9, GU 2010-2020 Campus Plan.

A revised 2010-2020 GU Campus Plan, presented to the Zoning Commission for approval, should clearly and specifically demonstrate how the future enrollment and building program will not overcrowd the campus and ensure effective protection and stabilization to the one-family residential character of Burleith and West Georgetown.

The Campus Plan provides no estimate of the number of additional dormitories that could be accommodated without significantly changing the Plan. The University architects provided a May 30, 2009 "Options Phase Presentation-Final" located about 141,000 sq. feet of residential housing on three sites. This option is not included in the Plan.

The Campus Plan should be revised with the objective of housing all undergraduates on the Main Campus, to the maximum extent possible and to house the remainder, including graduate students in University owned or rented housing in a satellite campus outside Zip Code 20007, in keeping with the policies of the Comprehensive Plan.
