

MAY 12, 2011

**BEFORE THE ZONING COMMISSION OF THE DISTRICT OF COLUMBIA
SUBMISSION OF THE CITIZENS ASSOCIATION OF GEORGETOWN
ON THE GEORGETOWN UNIVERSITY CAMPUS PLAN – CASE NO. 10-32**

INTRODUCTION

The viability of West Georgetown as a residential neighborhood is being threatened by the large number of Georgetown University (“GU”) students living in the neighborhood in group houses, several of which are owned by GU. The large and increasing number of GU students living in West Georgetown is changing the character of the immediately adjoining single family residential neighborhood. It is no longer a stable residential neighborhood with a few student rentals per block. The neighborhood is in fact transforming into a student enclave with the majority of the houses in some blocks consisting of student rentals. Families are leaving¹ and the quality of life for the adult residents remaining on those blocks has been significantly and adversely impacted by GU’s failure to build adequate housing for its students on Campus or in a satellite Campus. The objectionable conditions they endure include:

- loud and late night noise when working families and children are trying to sleep;
- alcohol fueled misbehavior and vandalism by students passing by or visiting nearby student houses;
- failure by student houses to comply with D.C. laws for trash disposal and collection;
- public urination and vomiting by students;
- overcrowding in and poorly maintained student houses

¹ See e.g., letters attached as Ex. A.

- student cars taking up a disproportionately large number of scarce street parking spaces and parked in backyards ; and
- retaliation against neighbors who file complaints with GU or the police.

The proposed Campus Plan does nothing to mitigate these adverse impacts; instead it proposes a 2100 increase in graduate students and a new undergraduate cap that would permit the University to increase traditional undergraduate enrollment significantly.

The University has not kept the promises it made to the community and to BZA in its 2000 Campus Plan to reduce the number of undergraduates living off campus and to respond effectively to community concerns about student misconduct. Instead, GU took advantage of the liberal cap on undergraduate enrollment and the ability to average fall and spring enrollment to increase fall enrollment by over 500 traditional undergraduates and about 300 non-traditional undergraduates, on average.² (Fall traditional undergraduate enrollment is significantly higher than spring enrollment and non-traditional enrollment is higher in the spring.³)

GU's Off Campus Student Affairs Program has largely been a failure and the University has violated the Campus Plan Order by tolerating student misbehavior that it pledged to address. The objectionable impacts on the community which the proposed Campus Plan fails to mitigate, as required by law, are the direct result of the University's decision to increase enrollment over the last decade but not build adequate housing for its students.

The University has turned its back on its 1990 Campus Plan pledge to become once again a residential undergraduate college and has instead required the adjoining communities to absorb

² See April 26, 2010 GU Campus Plan Presentation at 14 (Ex. B).

³ See Ex. E, F.

the burden of housing its students. The future of West Georgetown and the significant revenue it represents to the District is in jeopardy if a course change is not made in GU's housing and off campus student policies. GU should be given explicit directions to revise its Campus Plan to mitigate the objectionable impacts it has created in the community and to create a roadmap for more responsible growth in the future.

A. LEGAL BACKGROUND

Georgetown is primarily a residential community, zoned R-3, for mixed row houses and single family detached and semi-detached dwellings. R-3 districts are subject to the same restrictions on uses as in an R-1 district (detached single family houses). (11 DCMR §320.1). The restrictions on uses in these residential areas contained in the DC Zoning Regulations are designed "to protect quiet residential areas" (11 DCMR §200.1), and "to stabilize the residential areas and to promote a suitable environment for family life." (11 DCMR §200.2) Because it is located in an R-3 district restricted to low density residential uses GU is required every ten years to file a Campus Plan and obtain Zoning Commission Special Exception approval of its proposed University activities. (11 DCMR §210.1)

The Zoning Regulations set forth important standards that the Commission must find the applicant has satisfied in order to grant Special Exception approval to the Campus Plan. First, the Regulations state that "[u]se as a...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)

Second, "[i]n 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) 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.” DC Code §1-306.01(b)(4). The pertinent provisions of the Comprehensive Plan applicable to universities (10 DCMR §1214) which should guide Commission review of the University’s Campus Plan are:

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

Balancing University Growth and Neighborhood Needs – Discourage university actions that would adversely affect the character or quality of life in surrounding residential areas. 1214.6

Campus Plan Requirements – Each campus plan should include provisions that ensure that the institution is not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other similar conditions. 1214.7

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. 1214.8

Transportation Impacts of Colleges and Universities – Support ongoing efforts by colleges and university 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

In its review of the Campus Plan the Commission is required to consider not only whether new proposed activities are likely to become objectionable but also whether the Plan fails to resolve existing objectionable impacts on neighboring communities. *President and Directors of Georgetown College v. District of Columbia Board of Zoning Adjustment*, 837 A.2d 58, 65 n.7 (D.C. 2003) (“GU Case”).

The Commission is not restricted to approving or disapproving the Campus Plan; it may impose reasonable restrictions in order to minimize the impact of the university on the neighborhood, *Citizens Ass’n of Georgetown v. District of Columbia Bd. of Zoning Adjustment*, 365 A.2d 372, 377 n.7 (D.C. 1976); GU Case 837 A.2d at 69.

Furthermore, the authority of the Commission to impose caps on the number of students – both undergraduate and graduate students has been repeatedly upheld, especially in situations such as presented here where the University itself has proposed an enrollment cap. George Washington University v. DC Board of Zoning Adjustment, 831 A.2d 921, (2003); GU Case 877 A.2d at 71-72.

The Court in the GW case expressly upheld the Commission’s authority to require a University to provide housing for its students, 831 A.2d at 926-927. Alternatively, if the University declines to provide adequate housing for its students the Commission has clear authority to require the University to reduce its enrollment to a number consistent with its housing capabilities.

B. ENROLLMENT AND HOUSING

GU total student enrollment has increased significantly in the last 10 years from 10,000 in 2000 to over 14,000 students today and the number of students living in student group houses in West Georgetown has similarly increased. There was a brief decline in the number of undergraduate students living off campus following the construction of the Southwest Quadrangle dormitory in 2003 but the number is now higher than it was in 2000.

Traditional Undergraduate Enrollment and Housing			
Year	2000	2004	2010
Average Enrollment	5,516	5,617	5,921
Number living in West Georgetown	533	399	648

SOURCE: Year 2000: Office of Planning Report on GU Campus Plan, 2000-2010, BZA Application No. 16566, June 12, 2000, p. 28. (Ex. C); Year 2010: GU April 26, 2010 Campus Plan Presentation, p. 14, 18 ("Campus Plan Presentation") (Ex. B).

The number of undergraduate group houses in Georgetown and Burleith has also climbed from about 175 in 2000 to over 220 today.⁴

Furthermore, the use of averaging hides the true impact of the significantly higher fall traditional undergraduate enrollment. All students forced to live off campus in the Fall must find a place to live, resulting in overcrowding of student group houses and increased demand for student housing which remains student housing in the Spring.

⁴ 2000: BZA testimony of Lewis Bolan, June 13, 2000, p. 113 (Ex. D); 2010: CAG estimate based on neighborhood survey.

Traditional Undergraduate Enrollment 2009	
Actual Fall Enrollment	6,176
Average Enrollment	5,921
Difference	255

SOURCE: Campus Plan Ex. L, p. 2.

An unknown number of so called “non-traditional undergraduates” not subject to the 2000 Plan undergraduate cap also lived in West Georgetown in 2010. Non-traditional undergraduate enrollment has ballooned from an average of 650 in 2000 to 951 in 2009 (1,133 in Spring 2010). While GU data indicate that 301 of a non-traditional enrollment of about 650 lived in zip 20007 in 2000, it asserts only 79 lived in that zip code in the Fall of 2010.⁵ CAG questions the accuracy of that number. Indeed several of the enrollment and housing numbers GU has provided the community at meetings have subsequently been revised without explanation, raising questions as to the accuracy and completeness of GU’s data.⁶

While graduate enrollment has increased significantly in the last ten years (from 3,560 to 6,654), the number of graduate students living in Georgetown has remained relatively constant, according to GU, at about 180 students, 50% of whom live in West Georgetown.⁷ However that translates into 63 more student residences in West Georgetown, bringing the total undergraduate and graduate residences in West Georgetown to 236. See chart below. Furthermore, it is likely that some graduate students living in the community do not provide GU with their local address, leading to undercounting of graduates in the community.

⁵ Nov. 15, 2010 GU Response ANC2E (Ex. E); Ex. H to June 12, 2010 OP report (EX. C).

⁶ See Ex. F. Compare January 16, 2009 Fall enrollment number with April 18, 2010 Fall enrollment number and compare April 18, 2010 West Georgetown Fall 2009 housing number with April 26, 2010 West Georgetown Fall 2009 housing number.

⁷ Campus Plan Presentation, p. 15 (Ex. B).

Student Off Campus Residences West Georgetown, Fall 2010			
	Private	University Owned Townhouses	Total Residences
Undergraduate	173	27	200
Graduate	63	0	63
Total	236	27	263

SOURCE: Campus Plan (Ex. N); GU prehearing submission, Ex. B, p. 9.

The above numbers do not disclose the concentration of those houses into a student enclave near the University that continues to expand each year. See map in DC Office of Planning (“OP”) report dated May 5, 2011 at p. 8.

To mitigate the current objectionable conditions in West Georgetown and Burleith the University must provide housing on the traditional campus West of 37th Street or in a satellite location outside zip code 20007, as soon as possible for at least the 250 students the University has recently disclosed it could house on campus in an existing building and the remainder of its traditional undergraduate enrollment by Fall 2016, as recommend by OP. In Fall 2009 over 1300 undergraduates were living in Georgetown and Burleith in privately owned and University owned houses.⁸ The GU offer to house 250 students on campus or in an off campus location several years in the future is totally inadequate. Using the on campus hotel for undergraduate housing should be pursued but delaying a decision on its use until Fall 2014, which would probably result in an additional two years or more before it could be used for undergraduate housing, is totally unacceptable.

Graduates students living in the community present some of the same issues as undergraduates. Graduate students living in West Georgetown are also the source of complaints concerning loud

⁸ Ex. B, Campus Plan Ex. N.

late night parties, improper trash disposal, and increasing the neighborhood blight caused by poorly maintained rental properties. More importantly they represent part of the threat to the continuing viability of West Georgetown as a residential neighborhood because they add to the total density of students living in transient, rental housing in that neighborhood.

Unlike undergraduates who seek to live as close as possible to the University, primarily in West Georgetown and Burleith, many graduate students commute to the Campus. A GU survey disclosed that 24% of its graduate students drive to the Campus and 62% of its School of Continuing Studies ("SCS") students drive to Campus because they are coming from work.⁹

Graduate students living in group houses in the community often have multiple cars and they compete for the scarce parking spaces in West Georgetown, making it extremely difficult for residents to park near their homes. Most West Georgetown houses do not have garages and most residents must therefore park on the street. The total number of student group houses on a block effects the quality of life of the single family working residents, the availability of parking spaces, the desirability of housing on that block and ultimately property values.

GU's prehearing submission contains a provisional offer to create a satellite Campus for 1,000 of its SCS students but is unclear how many of the 1,347 SCS students currently enrolled will be affected.¹⁰ Dr. O'Donnell, University Provost, testified on April 14, 2011 that 1000 SCS students would be removed from the current number counted as being on campus (1347 per Ex. L, p. 3) and that about 200 were currently at the Clarendon, VA satellite campus. The number of graduate SCS students remaining on campus after the new satellite campus opens in December 2013 would therefore be less than 200, plus about 200 undergraduate SCS students for

⁹ April 26, 2010 Community Meeting Presentation at p. 17-18 (Ex. G).

¹⁰ Campus Plan dated Dec. 30, 2010, Ex. L, p 3.

a total of 400 SCS students on campus. However this needs to be a commitment from the University to be effective. The large number of SCS students currently driving to the Campus from work represent a significant traffic load on the residential streets, especially Reservoir Road which is already highly congested at rush hour. And they add to the competition for scarce parking spaces in the residential streets near the University. The University's proposal for an SCS satellite campus is a belated step in the right direction, but the numbers remaining on campus need to be confirmed.

GU proposes to increase graduate enrollment by almost 1,000 graduate students.¹¹ A significant number of those additional graduate students may seek housing in the residential neighborhoods near the University, including West Georgetown, leading to even greater density of student rentals, which in turn would adversely impact the stability and livability of those neighborhoods.

To prevent the destabilization of residential neighborhoods adjoining universities the comprehensive plan favors university growth via on campus housing and satellite campuses rather than increasing the pressure of student housing on the adjoining residential communities (§1214.5, 8). Accordingly, any increase in graduate enrollment on campus should be conditioned on the University providing graduate housing outside zip code 20007, which is serviced by GUTS or public transportation to the Campus.

It is important to note that the precise number of additional graduate students who will live in Georgetown and Burleith is not the issue. The problem is that the *total* number of undergraduate and graduate students living in the communities adjoining the University are too high at the present time. Any increase in University enrollment without housing being provided would lead

¹¹ Prehearing Submission dated March 30, 2010 at p. 1; Ex. A.

to further destabilization of these neighborhoods. A small decrease in undergraduate group houses in Georgetown immediately followed by a small but equal increase in graduate group houses would not achieve the goal of restoring these neighborhoods as residential communities. The residents of West Georgetown believe the current total student density is creating highly objectionable conditions in their community, and that any increase in GU student enrollment without a commensurate increase in University housing will exacerbate the current intolerable conditions in West Georgetown.

The Bolan Smart Associates Housing Study

The Bolan Smart Housing Study (GU Prehearing Submission, Ex. I) is an extremely narrow study that attempts to predict how many new graduate students will live in West Georgetown and Burleith if the Campus Plan as filed were approved. As Mr. Smart admitted under cross-examination, it does not take into account the impact of the significant number of undergraduates and graduates already living in those communities, and focuses solely on West Georgetown and Burleith. Foxhall Village and other communities in zip code 20007 are simply ignored. The Report therefore focuses on some trees (the new additions) in the forest of students living in zip code 20007. The Report also assumes that the only factor driving an increase in graduates living in Burleith and West Georgetown is the proposed increase in graduate enrollment.

The Report does not factor into its assessment the potential for a significant number of the approximately 6,000 graduate students currently housed off campus to move to those

neighborhoods. In a recent survey of GU graduate students conducted by the University, 9% reported that they would move “closer to the campus” because of their course work.¹²

Although the Bolan Smart firm may be a expert real estate economic consulting firm, its ability to predict student housing patterns has been shown to be subject to a considerable margin of error. Back in 2000, Mr. Louis Bolan, testified before the BZA that the building of the Southwest Quadrangle dormitory in 2003 would result in a 75% decrease in student group houses in Georgetown and Burleith.¹³ However, as a result of increases in enrollment and a desire by undergraduates to live as close to the University as possible, the number of undergraduate group houses has in fact increased substantially between 2000 and 2010 (from approximately 175 group homes to over 220 group houses in West Georgetown and Burleith).¹⁴ CAG’s estimate of the number of group houses is based on neighborhood surveys which could not determine the occupancy of many houses and is therefore conservative. GU data indicates there are 427 student residences in West Georgetown and Burleith (plus the University’s 27 townhouses).¹⁵

University owned Townhouses on 36th Street should not be used for Undergraduate Housing

Over the years the University has purchased 27 townhouses located on the 1400 block of 36th Street, N.W and the 3600 block of Prospect Street, N.W., outside the Campus boundaries.¹⁶

These townhouses were originally used as rental housing for graduate students, faculty and adult renters. In response to community demands to house more of their undergraduates on Campus,

¹² Ex. G at p. 18.

¹³ Ex. D at p. 113.

¹⁴ See Ex. D at p. 113; CAG estimate of number of group houses.

¹⁵ See GU Prehearing Submission, Ex. B at p. 9.

¹⁶ GU Campus Plan, Ex. N.

the University in 1990 announced it would convert the 111 beds in these townhouses to undergraduate housing. The residents of West Georgetown who live immediately adjacent to the townhouses on 36th Street, the so called “Magis Row” townhouses have been complaining to the University for many years about the extent of student misconduct, noise and poor maintenance of these University owned buildings, to date to no avail. See Appendix J to Oberlander Report dated March, 2011 for more information from the neighbors concerning Magis Row. Since the University has been unable to maintain peace and quiet on this block for over a decade, the immediate neighbors to the Magis Row townhouses believe that this objectionable condition should be eliminated and that the 60 some undergraduates housed in those townhouses should be relocated on campus in the new student housing the University is proposing to develop or in the approximately 200 vacant on campus beds that the University appears to experience every year.¹⁷

The Off Campus Student Life Program has been a Failure

The University claimed in its 2000 Campus Plan that it would deal effectively with student misconduct off Campus, through the creation of an Off Campus Student Life (“OCSL”) office, Student Neighborhood Assistance Program (“SNAP”) patrols and other initiatives.

BZA Order 16566F (approving the campus plan for 2000-2010) states:

37. The Applicant proposed to implement a new “off-campus student affairs program” with proactive measures intended to address adverse impacts from students living in the surrounding community. Elements of the program include:

(a) An acknowledgement that the University will address adverse impacts from students living off campus, including noise , drinking, partying, parking, trash, and disrespectful behavior;

¹⁷ GU Financial Plan attached as Ex. H.

(b) A clear statement that the University will not tolerate behavior that adversely impacts the surrounding community and reflects poorly on the institution;

However the OCSL programs have not been effective in reducing students misconduct or late night noise. In this Campus Plan the University states it has made some minor changes to the OCSL Program (another SNAP car, having off duty police patrol on weekends and having two community advisors live in the West Georgetown and Burleith neighborhoods). These additional measures have been in effect for the current school year and have not made any significant difference to the quality of life of the residents of West Georgetown and Bureith. There are simply too many blocks with too high a density of students, and too large an area to monitor all the students returning late at night to the campus from bars on Wisconsin Avenue and M Street. The University's insistence on the identification of the students involved in misconduct by name or address and the failure to impose serious sanctions even on repeat offenders who have been identified are also issues. The failure of this program has been brought to the attention of the University on multiple occasions at numerous meetings over the last ten years by the residents directly impacted without any effective action being taken by the University. The University has therefore violated the Campus Plan Order by tolerating the behavior that it pledged to address.

The costs of this failure has been born by the community and by the D.C. Police Department. Given the ineffectiveness of the University's off campus programs, residents now usually call the police to respond to "disturbing the peace" and other student misconduct rather than SNAP, resulting in disproportionate amounts of police effort spent dealing with student incidents. While more effective then SNAP in quickly shutting down loud late night parties, police are reluctant to arrest students and produce only temporary results. Having lived with this problem for over a

decade the residents of West Georgetown believe the only effective solution is to house undergraduate students in University owned housing with adult supervision on-site. One of the endemic problems of the Magis Row Townhouses is that the four or more students who share these townhouses do not have any on-site adult supervision.

The Transportation Management Plan Requires Improvement.

The residential streets surrounding the University are extremely congested, especially during rush hour and the University's students compete with residents for the small number of parking spaces available in the neighborhoods near the University. The University should continue to prohibit all of its student from driving to or parking a vehicle on campus but it needs to do more to deter students from driving to the Campus and parking in the near-by neighborhoods. The University should prohibit its students from parking in the immediately adjoining communities and give tickets with University imposed fines on any student cars found in those communities by the Campus Police. A similar program has been adopted by American University and has been reported to be successful in deterring students from parking near American University.

The Georgetown University buses should be rerouted to use the Canal road entrance to the University to the maximum extent feasible. The rush hour ban on left turns into the University should be lifted for GUTS buses by DDOT. GUTS buses should not use the Prospect Street gate to exit the Campus onto residential streets.

The Proposed Campus Plan for the Hospital should be Rejected.

There is insufficient evidence in the Campus Plan for the community or this Commission to evaluate the Plan for the Hospital. A plan that calls for a new hospital with 500,000 additional

square feet somewhere on the GU Campus without further detail on location and use of the additional density is not a plan. Rebuilding the hospital on its current site would, according to a Medstar official, involve a decade of construction and construction traffic on Reservoir Road that would be extremely burdensome on the surrounding neighborhoods. Piecemeal reconstruction would also be disruptive for the hospital, its patients and staff. Rebuilding the hospital on the current site would also appear to create objectionable bulk and density conditions on the existing site facing Reservoir Road and may pose traffic and parking issues, especially during construction.

Fortunately a site exists on the University Campus on which to build a completely new hospital before shutting down and razing the current obsolete hospital. Building a new hospital on the North Kehoe field site identified by the University as a potential site for the new hospital at the April 14, 2011 hearing, combined with a loop road to the Canal Road entrance, would avoid piecemeal reconstruction and permit some of the hospital traffic on Reservoir Road to be rerouted to Canal Road, easing traffic on that heavily congested arterial.

CAG is in favor of a new up-to-date hospital on the GU Campus, but we agree with MedStar representatives who have stated publicly that piece-meal construction on the current site is not desirable. For some reason negotiations between the University and MedStar concerning plans for the new hospital have been moving extremely slowly. The University's request for an additional 500,000 square feet of hospital density without indicating where that density will be located and what additional traffic and parking demand would be created by it should not be approved. The University and MedStar should be instructed to submit a proposed amendment to the Campus Plan when they reach an agreement on what the plan should be.

Georgetown University's Proposed Undergraduate and Overall Enrollment Caps have Serious Flaws

While GU's proposed methodology for counting its students has the virtue of being more transparent than its past practices, the proposed undergraduate and total student caps have serious flaws. GU's proposed undergraduate cap of 6,675 is much higher than the current full-time, traditional undergraduate cap of 6,016, because various categories of previously excluded "non-traditional undergraduates" are included, such as students over 25, commuters, part-time students and students studying abroad. Under the new proposed IPEDS methodology the University would have the flexibility to decrease the number of these previously excluded categories of students and increase the number of traditional full-time 18 years old undergraduates. And it could do so without providing any additional undergraduate housing. Dr. O'Donnell, Provost, testified that the University did not intend to engage in such substitution and that it intended to maintain the number of full-time traditional undergraduates as that term is defined in the 2000 Campus Plan Order at current levels. If the University's proposal or some variant of it were to be accepted by the Commission it would therefore be essential to add the proviso that there shall be no increase in the number of traditional full-time undergraduates from current levels until adequate housing for 100% of its current undergraduate enrollment has been provided.

The proposed main Campus student head count, Campus Plan, Exhibit K, as modified in the Prehearing Submission to be a cap of 15,000 total students, also gives the University the flexibility to change the enrollment of any of the categories of graduate students currently covered, which includes medical students, traditional graduate students, graduate SCS students and certain undergraduates. Medical students typically seek housing near the University and

26% of GU's current medical student enrollment lives in zip code 20007.¹⁸ Any increase in medical student enrollment would have more of an impact on the adjoining communities than an increase in traditional graduate students who are more dispersed or SCS students who are mainly commuters to the University from their places of employment. The University has stated in its Campus Plan, p. 10, that it intends to maintain the current medical enrollment and Dr. O'Donnell testified that current medical student enrollment will not increase during the life of the Plan. Accordingly, the Commission should establish a graduate cap for medical students at current levels.

Finally, the Commission should set a cap on SCS students at current levels (about 1,350 students, less 200 in the Clarendon, VA satellite campus, plus 210 undergraduate SCS students), but in recognition of the University's commitment to move 1,000 of those students to a satellite campus by Fall 2013, the Commission should set a cap of no more than 400 SCS students on campus for Fall 2013 and following years.

Conclusion

1. The Campus Plan should be rejected in its entirety because it fails to mitigate adequately the objectionable impacts of the University's current uses and would create new adverse impacts on the community. The Commission should direct the University to submit a revised Campus Plan that would adequately mitigate the objectionable conditions created in the surrounding community.
2. Specifically, the University should house on campus all freshman, sophomore, and juniors by Fall 2014 and house 100% of its traditional undergraduate students on campus or in an

¹⁸ Campus Plan Presentation at 15, 19.

off campus location outside zip code 20007 by no later than Fall 2016, as recommended by the Office Of Planning (OP).

3. In addition to the timetable set forth in the OP report, the University should be directed to reduce its traditional undergraduate Fall 2013 enrollment by 250 students, unless it provides housing for 250 students either on campus or in an off campus site outside zip code 20007 by Fall 2013.

4. The townhouses owned by the University on 36th Street currently being used as group houses for about 60 undergraduate students should revert to their former uses by Fall 2013 and the University should commit not to purchase any additional property in zip code 20007 for use as student housing.

5. The University should be encouraged to develop a more effective plan for dealing with illegal and harmful student behavior off campus, including strengthened sanctions such as suspension or expulsion for repeat serious offenders and off campus party regulation rules identical to those in effect on campus. While the precise measures to adopt must be left to the University, the obligation to minimize objectionable impacts rests with the University.

6. The University's Medical School and School of Continuing Studies ("SCS") enrollment should be maintained at existing levels and the SCS on campus enrollment should be capped at no more than 400 by December 31, 2013 consistent with the University commitment to move most of its SCS students to a satellite campus by that date.

Respectfully submitted,

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