

Analysis of GU's conditional amendments to its plan contained in GU's Prehearing Submission, March 31, 2011

In its Prehearing Submission dated March 30, 2011, Georgetown University presented several “concessions” and other conditional modifications in its proposed 2010-2020 campus plan. Some of these may be, at most, small steps in the right direction – but they are very small steps. They do not come close to what is needed.

1. Relocating Undergraduates Out of the Off-Campus Georgetown and Burleith Neighborhood

GU now proposes to move some 250 undergraduates out of the residential off-campus neighborhood adjacent to its main campus. The proposal is much too small to have any significant effect; it is filled with loopholes; and it would be on a timetable that could take years to accomplish.

- There are now approximately 1,400 to 1,750 undergraduates and an additional 1,100 graduate students living off-campus in zip code 20007 (the traditional boundary of the high-impact area adjacent to GU). Moving only 250 will not come close to addressing the problem.
- The “250” student GU describes are really only 139 students. GU already has 111 undergraduates living off-campus whom GU arbitrarily counts as on-campus. One of the prices for the GU proposal is that it would keep those 111 students off-campus but continue counting them as on-campus.
- The proposal could result in not moving the 250 students out of the community at all. GU could keep the 250 students in the high-impact off-campus community by housing them on non-residentially zoned land within Zip Code 20007. That land often abuts residentially zoned land in this area and would not solve the problem.
- GU has not proposed that any additional student housing it may create will be on the traditional part of the main campus, west of the main gates. The proposal instead could result in more undergraduates being housed by GU in a residential neighborhood outside of the traditional part of the campus.

- The proposal could take years to implement. If GU decides to house the 250 students on campus, GU could take 3 years before even applying to the Zoning Commission for processing approval. With additional design and construction time, it could be 5-6 years or more from now before any of the students actually would be moved.

GU can and should do much better than this. GU's 1990's goal of having 100% of its undergraduates housed on campus (or elsewhere than in zip code 20007) should be re-adopted and that goal should be achieved rapidly.

2. Moving School of Continuing Studies Students to a Satellite Campus

GU now says it will relocate 1,000 students in the School of Continuing Studies (SCS) to one or more satellite locations by December 31, 2013. Since SCS students are a significant traffic and parking burden on the community and some live in the community, this proposal is a step in the right direction, but at a minimum it needs clarification to be effective.

- By GU's own count, there are now 1,347 SCS graduate students and 250 SCS undergraduates studying at the main campus, and GU projects that it could enroll another 1,000 or more over the next 10 years. If GU's proposal is to move only its anticipated growth in SCS enrollment elsewhere, the proposed satellite campus could result in little or no net reduction of SCS students at the main campus and no improvement over the current high-adverse-impact situation. However, GU's Provost, Dr. O'Donnell, appeared to testify that the intent is to move 1,000 of the 1,347 on the main campus plus any future growth to a satellite campus. That needs to be nailed down as a binding commitment.
- GU wants to treat SCS students as being at the satellite campus and not the main campus if they took 50+% of their credits at the satellite campus – even if they took up to 50% of their credits at the main campus and came to the main campus every day. The Office of Planning method of counting who is a student at the main campus is a much better measure of impact: a student is counted as at the main campus if the student takes one or more courses at the main campus.

GU can and should do much better than this. GU increased its graduate, medical and SCS students by some 3,000 students between 2000 and 2010, and it wants another increase of 1,000 to 2,000 students over the next 10 years. This imposes major, unacceptable burdens on the adjacent neighborhoods, and it is inconsistent with the Comprehensive Plan's emphasis on satellite campuses for growth in university

enrollment. GU should provide a satellite location or locations for all SCS students and for any significant increase in its graduate students as well. That is the path for responsible growth set forth in the Comprehensive plan for Universities in a residential community desiring to increase enrollment.

3. Committing to Enrollment Maximums

GU now says it will accept a “voluntary” enrollment maximum of 15,000 students, rather than the 16,000+ students by 2020 it had requested several months ago. This reduction is far too small to be effective in addressing adverse impacts on the adjacent community.

- GU’s enrollment has grown unexpectedly from under 10,000 students at the main campus in 2000 to over 14,000 students now, and GU wants to add 1,000 to 2,000 more students by 2020. The adverse impacts of the prior expansion the adjacent communities have been severe and any increase in enrollment at this time would make the existing situation worse.
- The neighborhoods surrounding GU are over-saturated now with students living off-campus and with students who live outside of zip code 20007 traveling through and parking in the neighborhoods. The impacts would be even greater if there were any increase in enrollment.
- That is why ANC 2E, community organizations, and the Office of Planning have emphasized the importance of effective, comprehensive enrollment caps for the main campus – unless and until GU takes significant steps to mitigate the situation, by e.g. creating satellite campuses.
- “Number of students” is one of the key criteria for measuring adverse impact by a university on a community, and imposing enrollment caps is a well-established remedy.

GU can and should do much better than what it has offered. Enrollment caps are needed at levels that are actually effective in reducing and mitigating the major adverse impacts that already exist.

4. GU’s Parking Issues – Simply Deferred

GU’s fourth and final “concession” is to defer requesting more on-campus parking spaces. This simply postpones a serious issue – over-parking and congestion from GU’s

traffic, both in the adjacent neighborhoods and on campus. It does not address or mitigate the problem at all.

Finally, GU's "concessions" do not address the multiple problems that remain with its proposed campus plan, such as the need for –

- Effective measures to address the current over-saturation of GU students in the neighborhoods adjacent to the University.
- Effective caps on all categories of undergraduates and graduate students at the main campus.
- GU should propose much more effective management and control by GU of off-campus student conduct.
- A transportation plan that reduces congestion, addresses student parking in the community, makes much better use of the Canal Road entrance to GU, and moves quickly to route the GU buses on arterial streets and off the residential streets.
- Meaningful, clear restrictions on the use of Kehoe Field, as set out in the ANC 2E findings and recommendations, p. 15. Instead, GU proposes (Pre-Hearing Submission, Ex. A, p. 4) to "restrict the use of Kehoe Field to uses similar to its current uses" – without specifying what it believes those uses are other than to say "including sports and recreational purposes," and without saying what GU believes "similar" uses might be.
- A coherent and constructive approach to addressing important issues relating to the GU/MedStar Hospital.

GU's "concessions" are presented on a take-it-or-leave it, all-or-nothing basis. But what they do address they respond to only minimally, and they do not even address many of the key issues that are of great concern to the community.

The bottom line: GU's proposed campus plan, as slightly revised in its Prehearing Submission, would continue to cause severe adverse impacts on the surrounding community and would be highly objectionable. It should not be approved as submitted.