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Office of Zoning
Government of the District of Columbia
One Judiciary Square
441 4th Street NW
Suite 210S
Washington, DC 20001

In reference to Case No. 10-32, Georgetown University Campus Plan 2011-2020:

Recently, the District's Office of Planning released its report on Georgetown University's 2010 Campus Plan. The most surprising, and unacceptable, facet of the report is its demand that the University house 100% of its undergraduate population on-campus by the fall of 2016. Should the university be unable to do so, OP mandates that the University's undergraduate population be incrementally reduced until it matches the amount of housing available on-campus. This would result in a reduction of 1,500 undergraduate students at Georgetown University, as well as cause significant economic harm to the District of Columbia.

It is arguably unprecedented for a local government to dictate to a university within its jurisdiction that it houses all of its students on-campus. The legality of doing so is very questionable. Under the DC Human Rights Act, students are a protected class of citizens. Although DC courts have allowed caps to be imposed on universities before, it remains unclear that they would be comfortable with a provision as extreme as this one.

Besides questions of legality, it does not seem practical for Georgetown University to be able to expand its housing stock, especially if the Zoning Commission agrees with the OP's recommendation that the University not be allowed to build outside its front gates, where some of its prime expansion areas, like the originally proposed '1789' block, lie. OP seems to base its belief that 100% of undergraduates on campus is realistic on the fact that other universities have done such a requirement, which ignores the specifics of the Georgetown campus and the limited physical space.

I strongly oppose the recommendations of the Office of Planning's recommendations and urge the DC Zoning Commission to approve Georgetown University's campus plan.

Sincerely,



Eamonn K. Moran, Esq.
Georgetown University Law Center,
Class of 2007
Georgetown University,
Class of 2004

ZONING COMMISSION
District of Columbia

CASE NO.

10-32

EXHIBIT NO.

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