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***goulston&storrs***  
counsellors at law

June 15, 2011

VIA HAND DELIVERY

Mr. Anthony Hood  
Chairman, D.C. Zoning Commission  
441 4th Street, NW, Suite 210  
Washington, DC 20001

**Re: Z.C. Case No. 10-32 – Georgetown University Campus Plan  
Rebuttal Submission by the University**

Dear Chairman Hood and Members of the Commission:

This submission is filed in rebuttal to testimony and information presented by opponents of Georgetown University's Campus Plan and also in response to the reports of city agencies. In addition, in further response to requests from the Commission and to community and city agency concerns, this submission supplements and amends the Campus Plan. Specifically, the Campus Plan is amended to add the following:

- Additional off campus student life enhancements, including a total of seven off-duty MPD "reimbursable detail" officers on Thursday through Saturday nights and two off-duty officers on Sunday through Wednesday evenings;
- New daily trash collection by the University, including Saturdays and Sundays;
- New proposed parking conditions to address student parking impacts;
- Community Council: a proposal for renewed community engagement; and
- New reporting processes for transparency and annual compliance review.

Additionally, the Campus Plan is amended to **remove** the following in direct response to community and city agency input:

- Removal of the proposed 500,000 s.f. new hospital (MHC-6); and
- Removal of the proposed realignment of 38<sup>th</sup> Street.

All of these changes are highlighted below and discussed in the attached materials and will be the subject of the rebuttal testimony at the June 20<sup>th</sup> public hearing.

ZONING COMMISSION  
District of Columbia

CASE NO. 10-32  
EXHIBIT NO. 273

## **Discussion of Rebuttal Materials and Campus Plan Changes**

### **I. Off Campus Student Life**

**Tab A:** Community Concerns Framework. Attached as Tab A is a framework for addressing community concerns that details the additional proposals proposed by the University to manage impacts identified by the community. The framework and related additional measures are provided in direct response to the Commission's request and to address community and city agency concerns. Key additional proposals include:

- In response to concerns raised by "walk-by" or transient noise from pedestrian traffic, the University will hire **four** additional off-duty MPD "reimbursable detail" officers on Thursday through Saturday nights (for a total of **seven** officers) and a **second** officer on Sunday through Wednesday nights. The additional officers will allow the University to assign some officers to stationary posts on Prospect Street and other identified "hot spots," particularly on weekend nights.
- In response to concerns about trash on neighborhood streets, the University will implement **new, daily** trash pickup of student-centric areas in West Georgetown and Burleigh. This will supplement regular DPW trash pickup. The University will continue to provide litter patrols on weekend mornings on O Street and Prospect Street between 37<sup>th</sup> Street and Wisconsin Avenue. The University will also continue to provide bulk trash pickup during the move-in and move-out periods of the Fall and Spring semesters.
- In response to concerns that the University is not responsive to concerns, the University will offer to affirmatively follow up with any neighbor who raises a concern—even after the initial issue has been resolved—to relieve the neighbor of the burden of redressing issues.

**Tab B:** Student Parking Measures. In response to concerns about students who park on neighborhood streets, the University will strengthen the University rules related to cars. These rules are detailed on Tab B, and include the following measures:

- Students who reside in University house shall be prohibited from bringing cars to campus or the surrounding neighborhood.
- Students who reside off-campus shall be required to adhere to University policy and District regulations regarding car ownership and registration. Furthermore, the University shall keep license plate and vehicle information for cars of undergraduate students.

- Violations of this policy will be grounds for discipline under the code of conduct, and violators shall be sanctioned. Notices of these restrictions will be provided to students and to the parents of traditional undergraduate students.

**Tab C:** Community Council. To ensure the effectiveness of the University's responsive efforts and to help the parties re-engage in dialogue, the University proposes the formation of a new Community Council, as detailed on Tab C. The University recommends that these meetings be facilitated by a neutral third party to assure productive conversations and good faith participation and the University recommends Justice and Sustainability, Associates, the same facilitator who previously worked with the University and the community.

**Tab D:** Benchmarks to Peer Institutions. The University has and will continue to share "best practices" with its peer institutions as it strives to enhance the effectiveness of its programs. Presently, and going forward, the University has the most comprehensive Off Campus Student Life Program of all of its peers. This is detailed on Tab D.

**Tab E:** Comparison of Off-Campus and On-Campus Rules. The University closely monitors the behavior of off-campus students, and in many instances those who live off campus are subject to rules that do not apply to on-campus students. To correct the record and rebut the misrepresentations made by ANC 2E in its May 12 presentation regarding on-campus and off-campus rules, the University submits an accurate and complete overview of all of the rules and regulations that govern off-campus student life. This chart is attached as Tab E.

**Tab F:** Spring 2011 Off-Campus Student Life Report. This report demonstrates the efficacy of the University's OCSL program, including, in particular, those policies that were put in place by the University over the past year. Again, only a small minority of student houses lead to an "interaction" (i.e. any report of any nature, including a proactive visit by SNAP).

## **II. Transportation**

**Tab G:** Supplemental Transportation Analysis. A complete draft of the University's Supplemental Transportation Analysis was submitted to DDOT on June 2, and all parties were provided with a courtesy service copy. The University further amended the Supplemental Analysis to address issues discussed with DDOT after the filing of the draft, including:

- removal of the request for concept approval of a new 500,000 square foot hospital (MHC-6) as well as the proposed realignment of the 38<sup>th</sup> Street intersection,
- detail on the positive transportation impact of the proposed enrollment changes,

- detail on the positive impact of the Loop Road (even without the AM left turn on Canal Road) on GUTS bus use of Prospect Street and Q Street,
- sanctions for students who violate University policy and District regulations regarding car ownership (detailed in Tab B), and
- new weekend shuttle service on M Street.

The amended document was provided to DDOT on June 13, and it is the document that is included as Tab G. The Supplemental Transportation Analysis demonstrates the lack of any objectionable impact due to traffic or parking.

Also included in Tab G is a direct response to the issues raised by CAG's traffic consultant.

**Tab H:** Loop Road Analysis. Attached as Tab H is an analysis prepared by the University and its consultants regarding its proposed on-campus GUTS turnaround. This report details the extensive analysis conducted of all possible GUTS bus turnaround alternatives and demonstrates why the proposed Loop Road is the only feasible means to facilitate bus turnarounds on campus. This report also reiterates that even without the removal of the A.M. left turn restriction on Canal Road, the Loop Road will still significantly reduce the number of bus trips on neighborhood streets.

### **III. Rebuttal Data**

The University submits the following information to address questions raised by the Commission during the course of the public hearing and rebut inaccurate and misleading information provided by the Office of Planning, ANC 2E, and parties:

**Tab I:** Using the same data that OP used (which was provided by the University to OP), the maps included in Tab I illustrate the correct percentages of student group houses in each block in the West Georgetown and Burleith neighborhoods. The correct numbers show that the percentage of group homes is significantly less than what OP portrayed in its charts.

**Tab J:** This chart was previously filed and is filed again to correct the data provided by OP regarding student enrollment.

**Tab K:** As specifically requested by the Commission, this demographic data demonstrates why undergraduate students pursuing their second degree in nursing or pursuing a degree through the School of Continuing Studies are excluded from the on-campus housing requirement along with non-degree students, consistent with what the BZA approved twenty years ago.

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**Tab L:** This exhibit demonstrates that the number of undergraduate student residences in the surrounding neighborhoods has decreased over the last ten years.

**Tab M:** This exhibit demonstrates that the number of undergraduate students living in the surrounding neighborhoods has decreased over the last ten years.

**Tab N:** As specifically requested by the Commission, this chart demonstrates the number of calls to 911 reporting “disorderly conduct” in the surrounding neighborhoods has declined over the past six years. The consistent decline in calls is particularly significant given that both CAG and Burleith have asked residents to use 911 instead of the University’s hot-line in recent years. Comparable information reaching back to 2000 was not available because the PSA boundaries changed prior to 2005.

**Tab O:** In its financial reports, the University self-identifies the ten top schools for which it competes for students and these are not the schools erroneously identified by OP. Under the proposed Campus Plan, Georgetown University will house more students than all but three of its ten peer competitors, notwithstanding the University’s significantly smaller endowment.

**Tab P:** In response to the CAG chart comparing Georgetown University’s density (students per acre) with national universities, this chart demonstrates that the University’s density compares favorably to the densities of the largest universities in the District of Columbia.

**Tab Q:** In response to Foxhall’s testimony that the University did not consider the impact of graduate student growth on the Foxhall community, attached as Tab Q is a supplemental analysis prepared by Bolan Smart Associates that specifically addresses that issue and demonstrates the lack of any objectionable impact.

**Tab R:** Bolan Smart has also prepared a brief report, attached as Tab R, that rebuts the testimony presented by Foxhall and demonstrates the lack of any objectionable impact from either current or projected graduate student growth.

#### **IV. Housing Site Analysis**

**Tab S:** Housing Site Analysis. As requested by the Commission and the parties, this report describes the extensive analysis conducted by the University to evaluate housing sites on campus and the criteria used. The report also demonstrates why the Leavey Center is the most viable alternative.

#### **V. Removal of Hospital and 38<sup>th</sup> Street Realignment**

In direct response to issues raised by OP, DDOT and the parties, the University is removing its request for concept approval of a new 500,000 square foot hospital as well as the

proposed realignment of the 38<sup>th</sup> Street intersection. At such time as MedStar's plans are known, a campus plan amendment and further processing application will be filed with detailed information on the specific height, density, location and design of the improvements, as well as a comprehensive transportation analysis.

**Conclusion**

With this filing, the University has responded to all of the requests for information in addition to providing the Commission and all parties with advance notice of the materials that will be addressed in the University's rebuttal at the June 20<sup>th</sup> public hearing.

Please contact Maureen or Dave at (202) 721-0011 with any questions regarding the enclosed documents.

Sincerely,

  
Maureen Dwyer

  
David Avitabile

Enclosures

cc: Andrea Salley, Georgetown University

**CERTIFICATE OF SERVICE**

On June 15, 2011, I caused a copy of the foregoing letter and enclosures to be delivered  
by hand to the following:

Jennifer Steingasser / Steve Mordfin  
D.C. Office of Planning  
1100 4<sup>th</sup> Street, SW, Suite E650  
Washington, DC 20024

Jeff Jennings / Colleen Hawkinson  
District Department of Transportation  
55 M Street SE  
Washington, DC 20009

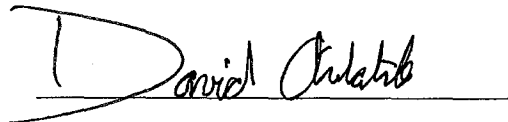
Advisory Neighborhood Commission 2E  
c/o Ron Lewis  
3400 Reservoir Road, NW  
Washington, DC 20007

Advisory Neighborhood Commission 3D  
c/o Ann Haas  
1601 45<sup>th</sup> Street, NW  
Washington, DC 20007

Richard Hinds  
Counsel for Citizens Ass'n of Georgetown  
2000 Pennsylvania Avenue, NW  
Suite 9000  
Washington, DC 20006

Foxhall Community Citizens Association  
c/o Robert Avery, Board President  
4442 Greenwich Parkway NW  
Washington, DC 20007

Christopher Clements  
Counsel for Burleith Citizens Association  
3600 Whitehaven Parkway, NW  
Washington, DC 20007

A handwritten signature in black ink, appearing to read "David Avitabile", is written over a horizontal line.

David Avitabile