

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Advisory Neighborhood Commission 2E



Representing the communities of Burleith, Georgetown and Hillandale
3265 S Street, NW • Washington, DC 20007
(202) 724-7098 • anc2e@dc.gov

By Hand Delivery

March 3, 2011

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

Re: Zoning Commission Case No. 10-32
Application of the President and Directors of Georgetown College for
Special Exception Approval of a New Campus Plan

Dear Chairman Hood and Members of the Commission:

On February 28, 2011, Advisory Neighborhood Commission 2E (ANC 2E) held its regularly scheduled public meeting which was properly noticed and attended by all seven ANC 2E commissioners, of whom a quorum is four commissioners. At that meeting ANC 2E adopted by a vote of 6-1¹ a report on Findings and Recommendations of Advisory Neighborhood Commission 2E Regarding the Georgetown University Proposed 2010-2020 Campus Plan (the ANC 2E Report). An original and 20 copies of the ANC 2E Report are enclosed.

As provided in a standing ANC 2E resolution, Commissioners Solomon, Lewis, Jones, Starrels, Birch and Eason, or any one or more of them, are authorized to present the ANC 2E Report to the Zoning Commission.

Please feel free to contact ANC 2E commissioner Ron Lewis with any questions regarding this submission. We look forward to presenting the ANC 2E Report and to participating in the upcoming public hearings.

Sincerely,

Ron Lewis
Chair, ANC 2E

¹ Commissioners Solomon, Lewis, Jones, Starrels, Birch and Eason voted in favor. Commissioner Sticka voted against.

COMMISSIONERS:

Ed Solomon, District 1 Ron Lewis, District 2 Jeff Jones, District 3
Bill Starrels, District 5 Tom Birch, District 6 Charles F. Eason, Jr., District 7

ZONING COMMISSION
District of Columbia
EXHIBIT NO. 10-32
15

cc by electronic delivery: Jennifer Steingasser, D.C. Office of Planning
Karina Ricks, District Department of Transportation
Maureen Dwyer and David Avitabile, Goulston & Storrs

COMMISSIONERS:

Ed Solomon, District 1 Ron Lewis, District 2 Jeffrey Jones, District 3 Jake Sticka, District 4
Bill Starrels, District 5 Tom Birch, District 6 Charles F. Eason, Jr., District 7

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*Findings and Recommendations of Advisory Neighborhood Commission 2E Adopted
February 28, 2011, Regarding the Georgetown University Proposed 2010-2020 Campus Plan*

Re: Zoning Commission Case No. 10-32, Georgetown University 2010-2020 Campus Plan

INTRODUCTION

Advisory Neighborhood Commission 2E (ANC 2E), serving the Georgetown, Burleith and Hillandale communities, has examined in detail the 2010-2020 campus plan proposed by Georgetown University (GU or the University) and respectfully submits these recommendations to the Zoning Commission.

We base our findings and recommendations on extensive input from individuals and organizations in the community as well as from the University – including at a special community meeting sponsored by ANC 2E on January 20, 2011 to consider the proposed campus plan, which was widely attended by community members – and on our own observations and experience from living in the community.

We have deep concerns about the plan presented by the University. The GU plan as proposed would have serious adverse effects on the community and would be highly objectionable.

The Zoning Regulations require that any use contemplated in a campus plan not be “likely to become objectionable to neighboring property.” Zoning Regulations section 210.2. To our great disappointment, GU has proposed a campus plan that is extremely likely – essentially certain – to be objectionable to neighboring property and therefore comes nowhere near meeting the applicable test.

We set out below our detailed findings and recommendations, including –

- The context of the 2010-2020 campus plan – what GU predicted would happen over the past 10 years and what actually happened;

- GU's objectionable impacts on the community;
- The need for enrollment caps on all categories of GU students and limits on the number of GU students living off-campus in zip code 20007, and related recommendations (Findings and Recommendations 1 through 5);
- The need to address objectionable transportation-related impacts of the proposed campus plan, and related recommendations (Findings and Recommendations 6 through 11);
- Issues relating to GU's management and control of off-campus student conduct (Findings and Recommendations 12 and 13);
- Issues relating to the proposed enclosure of Kehoe Field (Finding and Recommendation 14); and
- Issues relating to the GU/MedStar Hospital (Finding and Recommendation 15).

KEY ISSUES AND RECOMMENDATIONS

The Proposed Campus Plan in Context – the Past 10 Years

The context for examining the current proposed campus plan begins with GU's severe adverse community impacts over the past 10 years.

In a nutshell, GU has conducted itself so that what was supposed to happen over the past 10 years – a steep reduction in undergraduates living off-campus and in adverse community impacts – demonstrably did not happen. In fact, the situation that was considered objectionable by the BZA 10 years ago has become worse.

The campus plan as proposed falls far short of mitigating and reversing these impacts. It begins with a situation that is already highly objectionable to the adjoining residential communities and proposes increases in enrollment and other changes that would make the situation worse.

What was supposed to happen under the 2000-2010 campus plan. Both the BZA and the Office of Planning (OP) determined 10 years ago that there were too few GU undergraduate students living on campus and far too many living in and disrupting the neighborhood. GU agreed to house more students on campus and stated that by building the Southwest Quad

dormitory, the number of undergraduate students living off-campus in the neighborhood by 2010 would be greatly reduced. GU also projected that graduate student enrollment would rise somewhat, but that undergraduate and graduate student enrollment by 2010 would be under 10,000 total students. That was at the core of the 2000-2010 campus plan, based on GU's projections and the BZA and OP expectations. (See Office of Planning Report re the GU 2000-2010 Campus Plan, July 14, 2000, p. 10 Table 2.)

What actually happened under the 2000-2010 campus plan. GU did build the Southwest Quad in 2003, with 780 undergraduate beds. However, over the 2000-2010 period GU more than made up for that by greatly expanding its undergraduate and graduate student enrollment. GU took advantage of every allowance, every loophole, and every uncapped category of student (including "nontraditional" undergraduates and all categories of graduate students) during the past 10 years to expand its enrollment far beyond anything that was contemplated when the 2000-2010 campus plan was approved. Total GU enrollment has actually increased to over 14,000 students by 2010. As a result, the number of GU students living off-campus in the neighborhood has not been reduced from the number that was found to cause significant adverse impacts in 2000. In fact, **the number of off-campus students now living in the neighborhood, and the number of student group houses, is higher than in 2000.**

The result, not surprisingly, is that the adverse impacts the BZA found 10 years ago are even worse now than they were then.

GU's Adverse Impacts on the Community

The Georgetown and Burleith neighborhoods are severely and adversely affected by the increasing impacts caused by GU and its students. **The activities and occurrences range from the outright illegal but generally unchecked misconduct to continual disruption of the neighborhood that, while not criminally actionable, nevertheless more than meets the zoning standard of an objectionable impact.** These will be described in detail at the hearings and include late-night drunken behavior; disruptive behavior at off-campus group houses; frequent, clearly audible noise at hours when working families are sleeping, or trying to sleep; poorly maintained student group houses; continuing failure by student group houses to abide by D.C. laws and community norms for trash disposal and collection; cars from group houses filling up back yards and the neighborhood's already-scarce parking spaces; and loud, moving commotion as groups of GU students travel through the neighborhood after the M Street bars have closed or from one party to another.

Any one of these types of disruption would be bad enough, but the combination is devastating. It is threatening the continued viability of Georgetown and Burleith as residential communities.

If these problems continue unrelieved, the stable, engaged community we cherish – and that the D.C. zoning rules are designed to encourage – is at serious risk of being lost and becoming a rental property student enclave because of what GU is doing.

We are not, of course, suggesting that all GU students cause problems in the community. That said, though, the fact does remain that a very large number of GU students – much larger than just the “reported” incidents alone – often through late-night activities and frequently fueled by alcohol, do not comply with the responsibilities of living in the community and continually do cause objectionable impacts.

The responsibility for this situation rests squarely with the University. GU has treated neither its own students nor the community fairly. GU has thus far not provided anything close to enough attractive, modern housing on campus for its undergraduates. GU, in its pursuit of ever-increasing tuition revenue, has enrolled far more students than its current campus can support. And GU has failed utterly in its duty to educate and guide its students in the responsibilities of living in a quiet residential neighborhood.

Simply put, because of how GU has conducted itself, our community is over-saturated with GU’s ever-expanding numbers of students, and the situation, unless remedied, will only get worse. **We need strong action by the Zoning Commission to assure that the current over-saturation will not be allowed to continue.**

We have also learned from long experience that **GU cannot be relied upon to control the disruptive off-campus situation through the GU-sponsored off campus student life program.** The current off-campus student numbers are simply too large for any system, let alone GU’s modest program and disciplinary measures, to be effective.

GU’s conduct-enforcement measures are loophole-strewn, sporadic, and demonstrably inadequate. Inexplicably, GU’s own conduct rules are considerably more lax for students living in off-campus housing than they are for students living on-campus, a disparity that only encourages the disruptive off-campus situation we are experiencing. While GU touts its “new” enhanced enforcement, the fact is that all of the measures it cites except one (the off-campus “contract”) are already in place – and **they do not work.** Even the “contract” is questionable – GU proposed something like it called a “commitment to responsible citizenship” in the 2000-2010 campus plan, and especially given the sheer number of off-campus students, it was ineffective then, too. See “Georgetown University Campus Plan 2000, October 4, 2005 Final BZA Submission,” Appendix Q, p. 4.

GU’s adverse effects on the community also include the impact of students who do not live in our community but who travel through it in large numbers every day to and from on-campus classes. A large number of these students drive, often during rush hours, and clog the community’s already-congested streets. And, like the students living in the community, they too

fill up the community's scarce parking spaces. GU, however, unlike other universities, has failed to provide meaningful satellite campuses to handle its increased enrollment.

ANC 2E Finding and Recommendation Number 1 – Caps on GU Student Enrollment

- (a) Caps on enrollment should be set that include all categories of GU undergraduate and graduate students, and no undergraduates should be lumped in with graduate students.**
- (b) GU should be required to count its students using a Full Time Equivalent (FTE) system. The FTE system is straightforward, relatively resistant to manipulation, and in use by other universities.**
- (c) Caps should be set at levels that take into account the adverse impacts from GU's un-projected and unanticipated increases in enrollment since 2000 – that is, to alleviate impact on the community, caps may and should be set at levels lower than current enrollment, with the lower levels phased-in so as not to affect individual currently enrolled students.**
- (d) Sub-categories of students should be established and capped separately to prevent manipulation – for example, Medical School students, whose impact is different from School of Continuing Studies students; and undergraduates in the former “nontraditional” category.**
- (e) If and when GU has in place one or more fully functioning new satellite campuses, consideration could be given to adjusting certain enrollment caps to take into account the effects of such satellite campuses. This could be treated as a modification in the plan, subject to separate Zoning Commission action at the time.**

ANC 2E Finding and Recommendation Number 2 – Limits on the Number of GU Students Living in the Surrounding Community

The number of GU undergraduates and graduate students living off-campus in the surrounding community is now more than the number of off-campus students living in the community in 2000 – when the BZA and OP found the situation to be objectionable – and far more than was projected for 2010 when the 2000 campus plan was approved.

- (a) The number of off-campus GU students living in the surrounding community must be greatly reduced – in a predictable, verifiable and enforceable manner.**
- (b) In its 1990-2000 campus plan, GU adopted the goal of having 100% of its undergraduates live on campus. That goal should be re-adopted as a key part of the 2010-2020 campus plan and a phased timetable should be established for meeting the goal.**

For this purpose, “on campus” means on the traditional GU campus behind the campus gates, or at any other location that is not in the surrounding community (and also, if the Zoning Commission wishes to add this, that is not in a high-impact residential area adjacent to other D.C. universities).

The “surrounding community” for GU has traditionally been defined as zip code 20007. That remains an appropriate boundary.

Current GU undergraduate student housing that is outside of the campus gates but within the established campus boundary would continue to be grandfathered but could not be increased, because of its proximity to the residential neighborhood.

- (c) Limits should be set for the number of GU students (undergraduates and graduate students) living in the surrounding community, and the first benchmark needs to apply as early as possible in the 2010-2020 period.**

Setting limits on the number of GU students living in the surrounding community was endorsed by OP for the 2000-2010 campus plan. The BZA did not adopt that proposal at the time, because the BZA believed the number of GU students living in the surrounding community would be greatly reduced by the new on-campus housing that was to be built (the Southwest Quad).

The projection in 2000 that the off-campus student housing saturation would solve itself when the Southwest Quad opened was, in hindsight, deeply flawed. There are now more undergraduates and graduate students living in the surrounding community than in 2000. The time clearly has come to protect the community by adopting limits on the number of resident off-campus GU students in the surrounding community.

GU would have considerable flexibility in meeting these limits. It could, for example, build more student housing on campus behind the gates – modern, affordable apartment-style housing that undergraduates, including juniors and seniors, would actually like and appreciate; re-purpose existing on-campus buildings for student housing; build or rent student housing elsewhere than in the surrounding community; or provide financial or other incentives for students to live elsewhere than in the surrounding community.

If, however, GU fails to take effective actions, then the ultimate form of relief would be to reduce the student caps until the number of GU students living in the surrounding community complies with the limits set. It should not come to that, but the ability to decrease enrollment caps if need be is important to the success of the plan.

In calculating how many GU students are living off-campus in the surrounding community, any students living outside of the campus boundary, whether in private housing or, e.g., university-owned townhouses, should be considered to be housed off-campus and not on-campus.

ANC 2E Finding and Recommendation Number 3 – Annual Audit of GU’s Compliance with Enrollment Caps and Off-Campus Housing Limits

To assure the integrity and transparency of GU’s reported numbers regarding compliance with enrollment caps and off-campus neighborhood housing limits, an independent auditing firm should conduct, and report publicly the results of, an annual audit of GU’s compliance with enrollment caps and off-campus housing limits.

ANC 2E Finding and Recommendation Number 4 – GU Should Cease Using the Off-Campus Townhouses in the 1400 Block of 36th Street NW (the so-called Magis Row) for Undergraduate Housing

The “Magis Row” townhouses are currently an off-campus row of undergraduate group houses in a residential neighborhood on 36th Street NW. For many years, these properties were occupied by traditional families. The University eventually purchased all of these properties and rented to the elderly, administrative staff, faculty, Jesuit priests, etc., which helped maintain a quiet neighborhood. More recently, there was a mix of faculty and graduate students in these houses.

During the last several years, however, GU began to house large numbers of undergraduate students in these townhouses (and recently renamed it Magis Row). This has turned the townhouses in essence into a dormitory outside the campus boundary, with no buffer between the campus and the community. The result has been a complete failure, with frequent late-night noise and other issues that have been very intrusive on the neighborhood, including –

- Frequent disruptions at all hours, especially late at night, from large parties, loud stereo music including music from cars, visitors loudly coming, going and congregating, and the like.
- A significant increase in the population density in these townhouses. We estimate the density has gone from around 25 residents living in these properties to approximately 65 student residents today.
- The utter failure of the University to instill and enforce standards of decorum appropriate to an off-campus location in a residential community.

GU's "experiment" of placing undergraduate students in these townhouses has been a failure. The 2010-2020 campus plan should protect the community by providing that GU may not place undergraduates in these townhouses.

ANC 2E Finding and Recommendation Number 5 – GU Should Not Be Permitted To Acquire Further Real Property in Zip Code 20007 Without Prior Approval

An earlier GU campus-plan order required GU to obtain BZA approval before acquiring more real estate for university purposes in zip code 20007 (<http://dcoz.dc.gov/orders/10814> (1977)). A similar condition should be included in the 2010-2020 campus plan. GU's continuing acquisition of real estate in zip code 20007 has a high risk of increasing GU's adverse impacts on the community and takes properties off the tax rolls. Any further such acquisitions should be treated as functionally equivalent to an amendment to the campus plan and should require Zoning Commission approval.

Transportation-Related Issues in the GU Proposed Campus Plan

The adverse transportation impacts that GU has on the surrounding community are very serious.

GU today has over 14,000 students and proposes to grow to over 16,000 students, for a campus that has historically been considered maxed out at 10,000 students.

Thousands of cars carrying people heading for the GU campus clog our community's streets and parking spaces every day.

Students living in the community, particularly in group houses, fill up the already-scarce on-street parking spaces with their cars.

GU's buses, plus supplementary buses sponsored by the GU Hospital, run through our residential streets every day, particularly during rush hours, adding to congestion and shaking the foundations of the houses on the residential streets along their routes.

GU's Canal Road entrance, built with community support on the basis that it would become the major access point for GU traffic, is under-utilized – both by GU's buses and by cars and other traffic traveling to GU.

GU's satellite parking availability outside of zip code 20007 is much too small and nowhere close to what is required.

GU's proposal to align a campus entrance more closely with 38th Street NW would, unless mitigated, encourage more cut-through traffic on a narrow Burleith residential street.

GU's proposed campus plan does not address these issues adequately. The plan needs to be modified in a number of ways to address these concerns.

ANC 2E Finding and Recommendation Number 6 – the GU and Hospital Buses Should Enter and Exit the Campus Using the Canal Road Entrance Only

- (a) The GU and GU Hospital buses are now disrupting the surrounding community by traveling on residential streets instead of on commercial streets. This needs to end. All GU and GU Hospital buses should enter and exit the campus through the Canal Road entrance.**

- (b) To the extent this would be facilitated by an improved north-south roadway on campus, that roadway should be constructed and completed in the first year of the campus plan.

GU's proposal for a loop road on campus could be one method of providing a better on-campus north-south route, but because of the proposed location of the western portion of the loop, there are environmental concerns and a lengthy and uncertain National Park Service approval process. Another location for a loop road could work, or an improved single north-south road on campus could work, with a turnaround at the northern end.

- (c) A current restriction on left turns for traffic exiting the campus at Canal Road during the morning rush hour should be modified to permit GU and Hospital buses to make a left turn at all times while exiting to Canal Road
- (d) Pending completion of an on-campus north-south roadway, GU should immediately work with existing on-campus spaces and roadways to turn buses around on campus so that all GU and Hospital bus traffic uses the Canal Road entrance.

If necessary, buses with a relatively short turning radius could be obtained; or turntable technology is available to turn buses around in a space not much larger than the length of a bus. See, for example, <http://www.carousel-usa.com/large-turntable.php>

- (e) There is a continuing problem of GU and Hospital buses running off-route through the community's residential streets at all hours. This has been pointed out to GU many times but GU has failed to remedy the situation. GU and the Hospital should be required to provide a reliable tracking system for the buses to keep them on route and off the residential streets. Such GPS tracking systems are widely available and relatively inexpensive.

ANC 2E Finding and Recommendation Number 7 – the On-Campus North-South Road Should Provide Access to the Hospital

In addition to accommodating the GU and Hospital buses, the on-campus north-south road should allow cars and trucks to access the Hospital from Canal Road.

This will provide long-overdue relief to the congested Reservoir Road corridor by providing an alternative means of access to the Hospital.

If a loop road is used and the western leg of the loop is limited to bus traffic, then the other portions of the loop should allow two-way traffic for cars and trucks to travel to and from the Hospital.

The existing on-campus gate that currently prevents north-south cut-through traffic should be modified to permit Hospital access from Canal Road.

ANC 2E Finding and Recommendation Number 8 – No Student Cars in the Surrounding Community

- (a) GU should provide students who live on campus or in the surrounding community – both undergraduates and graduate students – with a combination of incentives, better transportation arrangements, and satellite parking to assure that GU students will not have cars in zip code 20007.**

Many group houses have 4, 5 or 6 students living inside. When they bring their cars, a single group house can fill half the parking spaces, or more, on their side of a block. Multiple group houses on a block make the problem worse. And on-campus undergraduates who bring cars and overnight guests with cars simply add to the problem.

This is unfair to the permanent residents. If GU students living on or off campus in zip code 20007 insist on bringing cars despite GU incentives and alternate transportation arrangements, those cars should be parked elsewhere.

- (b) GU students who commute to campus by car from outside of zip code 20007 should not be permitted to park in the surrounding community. (See Recommendation 9, below, regarding satellite parking.)**
- (c) GU should also strongly encourage students – including financial encouragement, if need be – to travel to campus other than by private cars. This should include public transit, GU buses, and bicycles. It should also include such car-sharing possibilities as Zipcars, as long as enough Zipcar or similar parking spaces are provided on the main campus behind the gates.**

ANC 2E Finding and Recommendation Number 9 – GU Should Provide Satellite Parking Adequate for its Traffic

GU's satellite and on-campus parking is now of limited capacity and far below the volume of vehicles that come to the campus every day and seek parking. GU should create enough satellite parking – outside of zip code 20007 – to meet the demand. Shuttle service should connect satellite parking to the campus via Canal Road.

ANC 2E Finding and Recommendation Number 10 – To Alleviate the Moving Noise and Disruption of Groups of Students Traveling on Foot through the Neighborhood Late at Night from the M Street Bars in Georgetown back to Campus, GU Should Provide a Shuttle Between M Street and the GU Campus via the Canal Road Entrance

A continuing source of late-night noise and disruption in the surrounding community is generated by groups of GU students who have spent time in the M Street bars and then walk back through the residential areas of Georgetown, often inebriated, making an excessive amount of noise. This has become a significant problem.

To alleviate the problem, GU should provide shuttle service from along M Street in Georgetown to the GU campus, using the Canal Road entrance.

GU now runs some vans through the residential streets – a program it started up some time ago without consulting the community – but these do not run on M Street and do not address the core problem. Indeed the vans, to the extent they are used at all, often contribute to the problem when groups of students congregate loudly on residential sidewalks waiting for a van.

ANC 2E Finding and Recommendation Number 11 – Any Realignment of GU's Reservoir Road Entrance Near 38th Street NW in Burleith Should Protect 38th Street from Becoming a Cut-Through

GU proposes to realign its Reservoir Road entrance so that it is directly across from 38th Street NW. DDOT has not, as far as we know, identified the current alignment as a major or priority safety concern. Moreover, 38th Street is a narrow residential street, and unless protections are added, the proposed realignment could increase

the risk of 38th Street becoming a cut-through. DDOT should be requested to address this issue before any approval is given and also to address the related issue of making 37th Street NW more accessible to eastbound Reservoir Road traffic that seeks to turn left onto 37th Street NW.

Issues Relating to GU's Management and Control of Off-Campus Student Conduct

Caps on GU's enrollment and limits on the number of GU students housed in zip code 20007 are crucial steps in restoring and protecting the surrounding community, as described above. But even when these measures are fully implemented, GU students will continue, for example, to travel in groups through the neighborhood at night to and from the M Street bars. To protect the community, **GU's management and control of off-campus student conduct must be made stronger, more effective, and accountable.**

GU's current and proposed measures concerning student conduct are far from strong, effective, or accountable. They need to be strengthened considerably.

A workable system of addressing off-campus conduct should include fixing the following problems with the current system:

Adoption of off-campus conduct rules that are at least as strict as on-campus rules. Currently, GU's off-campus rules are considerably more lax than its on-campus rules. This has predictable disruptive effects off campus – for example, by encouraging off-campus partying. If GU does not tolerate certain kinds of activities and behavior on campus, it should not tolerate, let alone encourage by a disparity in rules, such activities and behavior off campus.

Adoption of a principle, which has been applied by George Washington University to its off-campus students, that if noise can be heard beyond the property line of an off-campus student residence, the activity is too noisy. See "Beyond GW – Guide to Living Off-Campus 2010-2011" published by the Office of Off-Campus Student Affairs, The George Washington University, p. 17 ("Loud parties, unnecessary shouting, and amplified sound are all examples of violations of general neighborhood common courtesies. Neighborhoods are full of working professionals, families with children, and older adults who seek respectful neighbors in their community. . . . When in doubt, go to your property line or community hallway. If the noise from your apartment can be heard there it is probably too loud.")

(This publication is available online at [http://gwired.gwu.edu/offcampus/merlin-cgi/p/downloadFile/d/24829/n/off/other/1/name/GLOC2010-2011\(Final\)pdf/](http://gwired.gwu.edu/offcampus/merlin-cgi/p/downloadFile/d/24829/n/off/other/1/name/GLOC2010-2011(Final)pdf/).)

A realistic definition of a “documented” violation, one that does not invite non-enforcement and put all the burdens on the community.

Application and enforcement of uniform, effective rules for all students, including graduate students and summer students.

Adoption and application of sanctions that work, measured by results. Repeat offenders should no longer be tolerated by the University.

Adoption of effective measures to address student late-night transient noise.

It is not our responsibility to design, and we are not asking the Zoning Commission to design, GU’s rules relating to student behavior and discipline. But **it is well within the Zoning Commission’s powers and responsibilities to request that GU come back, before a 2010-2020 campus plan is approved, with a much stronger and more robust system of addressing off-campus conduct by its students. And if GU refuses or fails to do so, it is well within the Zoning Commission’s powers and responsibilities to impose much stricter enrollment caps and take other measures to alleviate the problem.**

We are concerned also that GU’s proposed campus plan does not include a commitment that its control measures will actually remain in effect. GU’s proposed plan states, instead, that “over time these measures [managing off-campus conduct] may be refined and modified.” (GU proposed campus plan sec. 3.3, p.14) That, however, gives the community no protection at all. These measures, once proposed and approved, should not be subject to being weakened or eliminated by GU at will.

We therefore adopt the following findings and recommendations:

ANC 2E Finding and Recommendation Number 12 – GU’s Current and Proposed Measures to Control Disruptive Off-Campus Student Behavior Are Inadequate and Ineffective. GU Should Propose Strong Corrective Measures. If GU Does Not Do So, the Zoning Commission Should Adopt Significant Additional Enrollment Caps and Off-Campus Housing Limits at Low Enough Levels to Alleviate the Problem.

ANC 2E Finding and Recommendation Number 13 – Measures Proposed and Approved in the 2010-2020 Campus Plan for Controlling Disruptive Off-Campus Student Behavior Should Be Considered Commitments by GU and Should Not be Weakened or Eliminated by GU.

The Kehoe Field Enclosure

Kehoe Field is a large outdoor athletic field on top of Yates Field House. GU proposes to enclose Kehoe Field with a climate-controlled all-weather enclosure and install an updated artificial turf field.

While GU has told the community informally that the new enclosed field would continue to be used for low-impact (non-major spectator) athletics and not for other purposes, there is currently no commitment in the proposed campus plan to use the space solely for those purposes.

Kehoe Field is raised off the ground and noise can carry from that location. Also, the use of that space for events that draw crowds would create traffic and other problems. We would be very concerned if, for example, the new enclosed space were used for convocations, conventions, meetings, concerts, or spectator sports. Those types of uses would be intrusive and we oppose enclosing this space if that is what GU has in mind.

On the other hand, if GU is willing to limit the use of the enclosed field to non-spectator athletics, such as intramurals; varsity practice; and gym classes for the neighboring Trinity School, as occurs now; and if the hours of use did not extend into late-night hours, then we would not oppose a proposal to enclose the field as part of the campus plan. (To the extent height or design issues should be involved, those issues can be addressed on further review of a specific proposal and, especially, during design review by the Commission of Fine Arts.)

We therefore adopt the following finding and recommendation:

ANC 2E Finding and Recommendation Number 14 – The Concept of Enclosing Kehoe Field Would Be Acceptable if GU Agrees to Limit Use of the Enclosed Field to Use During Reasonable Hours for Intramurals or Other Non-Spectator Sports; Varsity Team Non-Spectator Practice; and Gym Classes for Trinity School.

The GU/MedStar Hospital

We leave discussion of the Hospital for last not because it is unimportant – it is in fact very important, both to the campus plan and to the community – but because **the plan as proposed regarding the Hospital appears to us to be neither real nor susceptible to meaningful analysis.**

In pre-filing community meetings, MedStar has made clear that the proposed plan as filed is not what MedStar much wants, and quite possibly not what it would actually ever pursue. We believe the plan as filed is more in the nature of a place-holder for a substitute plan that would be based on a land-use swap with GU and a new, modern hospital elsewhere on the main campus grounds. MedStar and GU have acknowledged that they are in intensive negotiations about this now, and a resolution may be expected fairly soon.

Especially in these circumstances, it is very difficult to evaluate the plan as filed regarding the Hospital. It does not appear to be a coherent plan; the description is barebones; and we believe it is very unlikely ever to occur.

If it must be evaluated on its face, though, the proposal for the Hospital as filed would be very troublesome for the community. Years of piecemeal construction would occur along Reservoir Road, at the end of which MedStar and the community would still have at the core an outmoded, 1940's hospital. And information has not been provided to date on traffic and other use-based implications of the plan as filed.

We appreciate very much MedStar's role in taking over the Hospital and the generally positive effects a new, modern hospital, with careful transportation planning, could have on our community. However, such a proposal has not yet been presented.

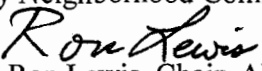
We therefore adopt the following finding and recommendation:

ANC 2E Finding and Recommendation Number 15 – The Plan as Proposed Regarding the Hospital Should Not Be Approved and the University and MedStar Should Be Encouraged to Complete their Negotiations if Possible and Present a Meaningful and Reasonably Detailed Plan for a New, Modern Hospital.

ANC 2E appreciates the opportunity to present these recommendations on issues of major importance in our community. We look forward to the hearings in this matter and to discussing these serious issues with the Zoning Commission at that time.

Respectfully submitted,

Advisory Neighborhood Commission 2E

By:  /s/ Ron Lewis, Chair, ANC 2E