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RICHARD DE C. HINDS
SARA D. SCHOTLAND
JOHN S. MAGNEY
JANET L. WELLER
SENIOR COUNSEL

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STEVEN J. KAISER
JOYCE E. MCCARTY
COUNSEL

KAREN A. KERR
SCOTT R. GOODWIN
JOHN P. MCGILL, JR.
PATRICIA M. MCDERMOTT
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PAUL BOZZELLO*
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RYAN C. GAUBERT
CAROLINE K. GREENE
REHANA GUBIN
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ROBERT HAYES

PAUL S. HAYES
MICHAEL HURST
MEGHAN A. IRMLER
HEATHER M. JOHNSON
MIJI KIM*
JAY LEE
MACEY LEVINGTON
COLIN D. LLOYD
JOHN R. LOATMAN
NICOLE MANARA
BRANDON MASLOV
JEFF MASON*
SUZANNE McMILLAN*
BENJAMIN MEEKS
YASMIN MEHRAN
JENNIFER MELLOTT
GREG MOKODEAN*
KEN REINKER*
PAUL R. ST. LAWRENCE III
VALERIE SCHUSTER*
OMAR SERAGELDIN
GREGORY M. SERGI
KELSEY W. SHANNON
ALEX SISTLA
JOSHUA STERN
JEREMY J. STEWART
JESS C. THEODORE
SUSAN TORZILLI
TEALE TOWELL*
KISH VINAYAGAMOORTHY
MARK W. WALKER
JOANNE L. WERDEL
MATTHEW R. WINGERTER
ASSOCIATES

* ADMITTED ONLY TO A BAR OTHER THAN THAT OF THE DISTRICT OF COLUMBIA.
WORKING UNDER THE SUPERVISION OF PRINCIPALS OF THE WASHINGTON OFFICE

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E-Mail: rhinds@cgsh.com

March 25, 2011

Sarah Bardin
District of Columbia Office of Zoning
441 4th Street, N.W., Suite 200-S
Washington, D.C. 20001

Re: Case Number 10-32

Dear Ms. Bardin,

Enclosed herewith are copies of the applications for party status filed today in the above entitled case involving the Georgetown University Campus Plan, submitted by the Citizens Association of Georgetown ("CAG") and Barbara Downs one of its members, and by the Burleith Citizens Association ("BCA") and three of its members, Edgar Russell and Irene and Larry Schaffner. The individuals in question have authorized CAG and BCA and its counsel to represent them in this proceeding, so all communications concerning any of these parties should be directed to the undersigned counsel and to the offices of CAG and BCA, who desire copies of all documents transmitted to counsel.

I would also like to draw your attention to the request for time made by CAG and BCA which total 1½ hours. The parties need to explain to the Commission not only the new objectionable conditions that would be created by the proposed Georgetown University Campus Plan but also the existing objectionable conditions in their respective communities created by Georgetown University, which the Plan fails to mitigate, as required by law. The parties believe

ZONING COMMISSION
District of Columbia

CASE NO.

EXHIBIT NO.

2011 MAR 25 PM 2:52

10-32

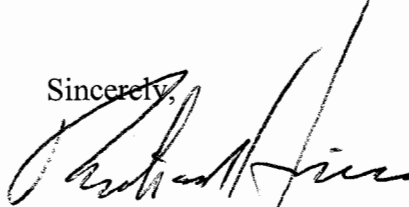
20

they cannot adequately make their case in opposition to the current Campus Plan without the time requested. I also understand that other neighborhood groups may apply to become parties to opposition and would request that additional time be allocated to them.

Finally, I request confirmation that the presentations to be made by CAG, BCA and any other parties in opposition, will be made on the second day of the Commission's scheduled hearings (May 12, 2011).

Thank you for your consideration of the attached party applications and the above requests.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard deC. Hinds", written over a horizontal line.

Richard deC. Hinds

Enclosures

cc: Maureen Dwyer (Goulston & Storrs)



FORM 140 - PARTY STATUS REQUEST



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(Please see reverse side for more information about this distinction.)

NAME: Last		First	Middle I.	
Citizens Association of Georgetown				
ADDRESS: Street	Apt. # (if any)	City	State	Zip Code
1337 Wisconsin Avenue, N.W.		Washington	DC	20007
Phone No.	Fax No.	E-Mail		
202-337-7313	202-333-1088	cagmail@cagtown.org		

I hereby request to appear and participate as a party.		Signature	Date
Will you appear as a(n)	☐ Proponent ☒ Opponent	Will you appear through legal counsel?	☒ Yes ☐ No

If yes, please enter the name and address of such legal counsel.

NAME: Last		First	Middle I.	
Hinds Richard				
ADDRESS: Street	Ste. # (if any)	City	State	Zip Code
2000 Pennsylvania Ave, N.W., Ste. 9000		Washington	DC	20006
Phone No.	Fax No.	E-Mail		
202-974-1540	202-974-1999	rhinds@cgsh.com		

WITNESS INFORMATION:

On a separate piece of paper, please provide the following witness information:

1. A list of witnesses who will testify on the person's behalf;
2. A summary of the testimony of each witness (*Zoning Commission only*);
3. An indication of which witnesses will be offered as expert witnesses, the areas of expertise in which any experts will be offered, and the resumes or qualifications of the proposed experts (*Zoning Commission only*); and
4. The total amount of time being requested to present your case (*Zoning Commission only*).

PARTY STATUS CRITERIA:

On a separate piece of paper, please answer all of the following questions referencing why the above entity should be granted party status:

1. How will the property owned or occupied by such person, or in which the person has an interest be affected by the action requested of the Commission/Board?
2. What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)
3. What is the distance between the person's property and the property that is the subject of the appeal or application before the Commission/Board? (Preferably no farther than 200ft.)
4. What are the environmental, economic or social impacts that are likely to affect the person and/or the person's property if the action requested of the Commission/Board is approved or denied?
5. Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the Commission/Board is approved or denied.
6. Explain how the person's interest will be more significantly, distinctively, or uniquely affected in character or kind by the proposed zoning action than that of other persons in the general public.

Except for the applicant, appellant or the ANC, to participate as a party in a proceeding before the Commission/Board, any affected person shall file with the Zoning Commission or Board of Zoning Adjustment, this Form 140 not less than fourteen (14) days prior to the date set for the hearing.

PARTY STATUS CRITERIA

1. The Citizens Association of Georgetown (“CAG”) represents over 1,200 individual members, all of whom are residents of Georgetown. Many of CAG’s members, including Barbara Downs, own property and live within a few blocks of Georgetown University (“GU”) and would be directly and negatively affected by proposals and policies contained in the proposed GU Campus Plan. CAG is the sole civic association representing residents of Georgetown and it has been granted party status to represent the interests of its members in the last several GU Campus Plan proceedings.
2. The majority of CAG’s members own property in Georgetown, all regular members are residents of Georgetown.
3. Varies. See item 1 above.
4. If the GU Campus Plan were approved as filed it would have a negative impact on the quality of life of all persons living in Georgetown, especially those living in West Georgetown as a result of unrestrained growth in student enrollment and development. Further, the plan in its current form could also adversely impact property values and the environment in West Georgetown.
5. The high numbers of Georgetown students residing in rented group houses in the single family residential areas of Georgetown is adversely affecting the livability of those neighborhoods due to the late night noise from the students and their visitors and other objectionable conditions including adverse traffic and parking impacts, trash violations, failure to maintain property, vandalism and intimidation of neighborhood. The University’s failure to

provide adequate on campus housing for its students is threatening the viability of West Georgetown as a residential neighborhood and creating objectionable conditions throughout Georgetown.

6. The residents of Georgetown are distinctly and uniquely affected by the proposed zoning action because it fails to mitigate the objectionable conditions created by the University and its students in Georgetown and threatens to make a bad situation even worse. CAG represents the interests of over 1200 resident of Georgetown. Accordingly at its meeting on January 25, 2011, the Board of Directors of CAG authorized counsel to file this application to enable CAG to participate in this proceeding as an opponent of the proposed GU Campus Plan.

Citizens Association of Georgetown

Witness Information

1. Jennifer Altemus, President
2. Luca Pivato, Vice President
3. Cynthia Pantazis, Director and Chair of CAG's GU Relation's Committee
4. Barbara Downs, Director

Expert Witnesses

5. George Oberlander, expert on urban planning and development, D.C. zoning and planning policies (CV attached).
6. Joseph Mehra, expert on transportation planning, traffic engineering and parking (CV attached).

Summary of Testimony

The CAG witnesses will describe the objectionable impacts on the Georgetown community caused by Georgetown University, the failure of the Campus Plan to mitigate those objectionable conditions, and why the proposed plan would exacerbate those objectionable impacts because of the proposed increases in enrollment, traffic and parking and other objectionable proposals. The witnesses will describe the adverse impacts caused by Georgetown University's housing policies and transportation plan, and the failure of the Off Campus Student Life Program to address adverse impacts of students living off campus in the community. The witnesses will comment on the hospital expansion plan and discuss the specific changes in the Campus Plan that are required to mitigate the objectionable conditions in Georgetown which the University has created.

George Oberlander will summarize his reasons for concluding that the proposed Campus Plan must be rejected for failure to comply with the relevant regulatory standards for Zoning Commission approval. He will explain the deficiencies in the Plan and how they can be corrected.

Joseph Mehra will testify concerning the Transportation Plan prepared by consultants to Georgetown University and, if made available, any plan prepared by Georgetown University Hospital, and address whether objectionable traffic and parking impacts would be created by the proposed Campus Plan and how they could be mitigated.

Time required: CAG's presentation will take one hour, including a short video presentation.

George H.F. Oberlander, AICP

Urban & Regional Planner

- Over fifty years of extensive, comprehensive urban-regional planning and development administration at the city, metropolitan and federal government level.
- Thirty-one years with the National Capital Planning Commission (NCPC) Washington, DC, developing planning policy recommendations; directing professional staff; coordinating DC and Federal agencies development projects in the National Capital Region.

SPECIAL EXPERTISE IN:

Zoning regulations, project development, environmental and comprehensive planning;
Foreign Mission and International Organization locations;
Capital programming;
Intergovernmental relations and community participation;
Federal & DC Government building projects.

EXPERIENCE:

1997 – Present; **GO Consulting**, part-time urban planning and zoning advisory services.
(Client list attached)
1995 – 1996 Director, Planning Review and Implementation; NCPC (Retired 1996)
1990 – 1995 Director, Technical Planning Services, NCPC
1979 – 1990 Associate Executive Director, DC Affairs, NCPC
1975 – 1979 Director, Federal Review, NCPC
1968 – 1980 Lecturer, School of Architecture & Planning
The Catholic University of America
1966 – 1975 Director, Long Range Planning and Regional Affairs, NCPC
1965 – 1966 Director, National Capital Regional Planning Council, Washington, DC.
1958 – 1965 City Planning Officer (Director), City of Newark, New Jersey
1956 – 1957 Resident Planner, George M. Raymond Associates, White Plains, N.Y.
1954 – 1956 Assistant Planner, Earl Morrow Associates, Ridgewood, New Jersey.
1955 William Kinne Fellows Memorial (six month traveling) Fellowship,
School of Architecture, Columbia University

GO Consulting: 11750 Old Georgetown Road, N. Bethesda, Md. 20852
301- 816-1153 Fax: 301- 816-1168 e-mail: goberland@verizon.net

GO Consulting CLIENTS:

- Citizens Association of Georgetown & Burleith Citizens Association, Washington, DC, 2010
- Woodly Park Community Association property owners and ANC 3C, Washington, DC, 2010
- Westbard / River Road Coalition, Bethesda, Md. (2008-2009)
- Friendship Neighborhood Association, Washington, DC (2007)
- Sibley Neighbors for Responsible Growth, Washington, DC (2007)
- Eckington Citizens for Responsible Development, Washington, DC (2007)
- Tilden Street Neighbors, Washington, DC (2006)
- Foggy Bottom Association, Washington, DC (2005-2008)
- Watergate Cooperatives – East/West, Washington, DC (2003-2004)
- Q Street Neighborhood Association, Washington, DC (2003)
- Friendship Heights Org. for Responsible Development, Washington, DC (2002)
- Penn-Branch Citizens/Civic Association, Washington, DC (2001)
- Tenleytown Neighbors Association, Washington, DC (2000)
- McKissack & McKissack Architects, Washington DC (NIH Day Care & Fire Station 1999)
- Wisniewski Blair Associates Ltd. Architects, Alexandria, Va. (Suitland Federal Center Security perimeter 1998)
- The Kennedy Center for the Performing Arts, Washington DC (Site & garage additions 1997-1998)

PROFESSIONAL AFFILIATIONS & MEMBERSHIPS

National Coalition to Save Our Mall, Washington DC, Vice President, 2000-present
Trustee/Member, Committee of 100 on the Federal City, Washington, DC, 1996-present
Trustee, DC Preservation League, Washington, DC 1996-2006
American Planning Association, American Institute of Certified Planners, 1964-present
President, National Capital Area Chapter 1970-1972
Lambda Alpha International, 1974-present (Honorary land economics society)
President, George Washington Chapter 1982-1984
The American Society of Landscape Architects,

- Accreditation Board, 1978-1981
- Council on Education, 1981-1984

Site Visit Team, Planning Accreditation Board, American Institute of Certified Planners
Board of Directors, United Planning Organization, Washington, DC, 1967-1979
National Association of Housing and Redevelopment Officials
Metropolitan Committee on Planning, New York, N.Y.
Executive Committee, Council of Social Agencies of Newark, Irvington and West Hudson, New Jersey
Newark Junior Chamber of Commerce, Newark, New Jersey “Outstanding Executive”
New Jersey State Board of Professional Planners, original Board member

**GO Consulting: 11750 Old Georgetown Road, N. Bethesda, Md. 20852
301- 816-1153 Fax: 301- 816-1168 e-mail: goberland@verizon.net**

Jawahar (Joe) Mehra, P.E. PTOE

President, MCV Associates, Inc

Education

- MS/1972/Industrial Engineering
- BS/1969/Mechanical Engineering

Registration/Certification

- Professional Engineer: TX, VA, MD, DE
- PTOE

Affiliations

- Fellow, Institute of Transportation Engineers
- Member, Transportation Research Board

Summary

Mr. Mehra has over thirty-five years of experience in the areas of project management, traffic engineering and transportation planning. He has managed numerous traffic engineering/operations studies including traffic analysis, impact studies and data collection. He has managed several traffic engineering studies in the Washington DC including the K Street Busway Study, the EISF preparation for Logan Circle residential development, EIS for PEPCO Project, The Bus rapid Transit Study, TIS for various land uses, traffic data collection projects for DDOT, Klingle Road Traffic Study, Field School Traffic Impact Study, etc.

Relevant Experience

Traffic Engineering. He has managed several traffic engineering studies with extensive experience in traffic simulation models such as Synchro, CORSIM and TRANSYT-7F. He managed the traffic analysis study for Fort Meade that used the CORSIM Model to evaluate roadway improvements to accommodate security measures implemented after September 11, 2001. He was also the Project Manager for a three year transportation planning "on-call" contract with VDOT for Region 2. As part of this contract the Tysons Corner area was analyzed using the Synchro model. Approximately 40 signalized intersections were analyzed for the existing conditions and future conditions. CORSIM Model was also used on several other projects to evaluate corridors such as the Route 207 corridor in Caroline County, the Eisenhower Avenue corridor for the Patent and Trademark Office in Alexandria, etc. Other traffic engineering studies that he has managed include the Route 58 (Pennington Gap Bypass) Traffic Engineering Study for VDOT, Route 1/123 Interchange Study, etc.

Transportation Planning/Forecasting. He was the Project Manager for the Dulles Corridor Metrorail Project - Station Traffic Circulation Study For Preliminary Engineering Extension To Dulles Airport / Route 772 to validate the station layouts and the traffic forecasts as they relate to station access issues for the Metrorail Extension. He has conducted statewide, regional, corridor and subarea planning studies in Washington, DC, Fauquier County, Warren County, Fairfax County, Loudoun County (using COG's Version 2 Model and VIPER that resulted in the County's Comprehensive transportation plan), Chesterfield County, Richmond area, Hampton Roads, Tri-Cities, Prince William County, etc. in Virginia; Montgomery County, Baltimore County, St. Mary's County, Charles County, Prince George's County, Germantown, Silver Spring, etc. in Maryland; York County, Pennsylvania; St. Louis, Missouri; Denver, Colorado; New York City, Connecticut, etc. using MINUTP, TMODEL2, EMME/2 or QRSII. He has managed multimodal planning studies for a broad range of clients. He was the Project Director for the New Approach Study for Integrating Transportation and Development in the National Capital Region using the MINUTP model. He was the Principal Investigator of a FHWA study on Analysis and Use of Trip Generation Rates resulting in S.I.T.E. Handbook and updated NCHRP 187 trip rates. He was MCV's Project Manager on a multi-disciplinary team to prepare the Georgetown Branch Transitway MIS in Maryland. He managed the Charles Town Circulation Study and the Leesburg Downtown Courts Transportation Study.

Environmental Planning. He has managed several environmental assessments and impact statements with emphasis on data collection, transportation, air quality, land use and noise using State and Federal guidelines. These studies were performed at regional, local and project levels. Examples include the Georgetown Branch Transitway EIS/MIS, US 1/MD 201 Corridor EIS, etc.



Planning - Engineering - Information Technology

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NAME: Last

First

Middle I.

Barbara Downs

ADDRESS: Street

Apt. # (if any)

City

State

Zip Code

3321 P Street, NW

Washington

DC

20007

Phone No.

Fax No.

E-Mail

202-337-3373

otoobad@comcast.net

I hereby request to appear and participate as a party.

Signature

Date

Will you appear as a(n)

☐

Proponent

☒

Opponent

Will you appear through legal counsel?

☒

Yes

☐

No

If yes, please enter the name and address of such legal counsel.

NAME: Last

First

Middle I.

Hinds

Richard

ADDRESS: Street

Ste. # (if any)

City

State

Zip Code

2000 Pennsylvania Ave, N.W., Ste. 9000 Washington

DC

20006

Phone No.

Fax No.

E-Mail

202-974-1540

202-974-1999

rhinds@cgsh.com

WITNESS INFORMATION:

On a separate piece of paper, please provide the following witness information:

1. A list of witnesses who will testify on the person's behalf;
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Barbara Downs
3321 P Street N.W.
Washington D.C. 20007

Ms. Jennifer Altemus
President Citizens Association of Georgetown
1337 Wisconsin Avenue, N.W.
Washington, D.C. 20007

RE: Georgetown University Campus Plan 2010-2020. Case No. 10-32

Dear Jennifer,

This letter is to authorize Citizens Association of Georgetown (CAG) and its counsel to represent me in the matter of the above referenced Georgetown University Campus Plan. I understand that the Association has the right to bind me in this case.

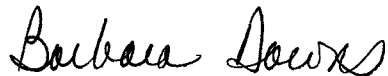
I live at 3321 P Street N.W., a house owned and resided in by myself and my husband, located a block and a half away from the main campus. There are six buildings on our block that house both graduate and undergraduate students. Along with our neighbors, I regularly have been troubled by noise and disruptions emanating from the student houses on my block and from students passing by on their way to their residences. Many of the incidents happen late at night, which disrupts sleep and the general peace of our residential neighborhood.

The student houses have trash and debris littering the narrow sidewalks in front. On weekend nights--weekends typically start on Thursday and go through Sunday---houses on the block have cans and glass bottles, often broken, strewn around. Furthermore, day time street parking is congested and often impossible. Like most of our neighbors we don't have a garage and must find street parking. Parking is particularly difficult on weekday evenings when continuing education classes are offered. The change during Christmas holidays and other school breaks is dramatic. During those times many parking places are available.

The economic effect upon our house is obvious. As student impact rises our values decrease---the consequence is economically detrimental both to my husband and me and to District revenue.

For the reasons summarized above, I am eager to be a party to the hearings on the Campus Plan and to be represented by counsel to CAG.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Downs". The signature is written in dark ink and is positioned above the printed name.

Barbara Downs



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NAME: Last		First		Middle I.	
Burleith Citizens Association					
ADDRESS: Street		Apt. # (if any)		City	State
P.O. Box 32262, Calvert Station 2336 Wisconsin Avenue, NW				Washington	DC
					Zip Code
					20007
Phone No.		Fax No.		E-Mail	
202-262-1261				BCA@burleith.org	
I hereby request to appear and participate as a party.			Signature		Date
Will you appear as a(n)			Will you appear through legal counsel?		
☐ Proponent ☒ Opponent			☒ Yes ☐ No		
If yes, please enter the name and address of such legal counsel.					
NAME: Last		First		Middle I.	
Hinds		Richard			
ADDRESS: Street		Ste. # (if any)		City	State
2000 Pennsylvania Ave, N.W., Ste. 9000				Washington	DC
					Zip Code
					2000
Phone No.		Fax No.		E-Mail	
202-974-1540		202-974-1999		rhinds@cghsh.com	

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PARTY STATUS CRITERIA

1. The Burleith Citizens Association (“BCA”) represents 142 member households, 129 of whom are residents of Burleith, a small community of 535 mostly single-family houses directly north of the Georgetown University (“GU”) Campus. All of BCA’s members, including Irene and Larry Schaffner and Edgar F. Russell live in close proximity to the University. They would be directly and negatively affected by proposals and policies contained in the proposed GU Campus Plan. BCA is the sole civic association representing residents of Burleith and it has been granted party status to represent the interests of its members in prior GU Campus Plan proceedings.
2. The majority of BCA’s members own property in Burleith, and all but 13 of its members are residents of Burleith.
3. Varies from across the street to a few blocks from the University. See item 1 above.
4. If the GU Campus Plan were approved as filed it would have a negative impact on the quality of life of all persons living in Burleith. It could also have adverse impacts on property values and the environment in Burleith.
5. The high numbers of Georgetown students residing in rented group houses in the single-family residential areas of Burleith is adversely affecting the livability of this neighborhood due to the late-night noise from the students and their visitors and other objectionable conditions including adverse traffic and parking impacts, trash violations, failure to maintain property and vandalism. The University’s failure to provide adequate on- campus housing for its students is causing the number of rented student group houses to increase significantly, threatening the

viability of Burleith as a residential neighborhood and creating objectionable conditions throughout Burleith.

6. The residents of Burleith are distinctly and uniquely affected by the proposed zoning action because it fails to mitigate the objectionable conditions created by the University and its students in Burleith and threatens to make a bad situation even worse. BCA represents the interests of 129 resident households of Burleith. Accordingly, the Board of Directors of BCA voted to authorize counsel to file this application to enable BCA to participate in this proceeding as an opponent of the proposed GU Campus Plan on February 4th, 2011.

George H.F. Oberlander, AICP

Urban & Regional Planner

- Over fifty years of extensive, comprehensive urban-regional planning and development administration at the city, metropolitan and federal government level.
- Thirty-one years with the National Capital Planning Commission (NCPC) Washington, DC, developing planning policy recommendations; directing professional staff; coordinating DC and Federal agencies development projects in the National Capital Region.

SPECIAL EXPERTISE IN:

Zoning regulations, project development, environmental and comprehensive planning;
Foreign Mission and International Organization locations;
Capital programming;
Intergovernmental relations and community participation;
Federal & DC Government building projects.

EXPERIENCE:

1997 – Present; **GO Consulting**, part-time urban planning and zoning advisory services.
(Client list attached)
1995 – 1996 Director, Planning Review and Implementation; NCPC (Retired 1996)
1990 – 1995 Director, Technical Planning Services, NCPC
1979 – 1990 Associate Executive Director, DC Affairs, NCPC
1975 – 1979 Director, Federal Review, NCPC
1968 – 1980 Lecturer, School of Architecture & Planning
The Catholic University of America
1966 – 1975 Director, Long Range Planning and Regional Affairs, NCPC
1965 – 1966 Director, National Capital Regional Planning Council, Washington, DC.
1958 – 1965 City Planning Officer (Director), City of Newark, New Jersey
1956 – 1957 Resident Planner, George M. Raymond Associates, White Plains, N.Y.
1954 – 1956 Assistant Planner, Earl Morrow Associates, Ridgewood, New Jersey.
1955 William Kinne Fellows Memorial (six month traveling) Fellowship,
School of Architecture, Columbia University

GO Consulting: 11750 Old Georgetown Road, N. Bethesda, Md. 20852
301- 816-1153 Fax: 301- 816-1168 e-mail: goberland@verizon.net

GO Consulting CLIENTS:

- Citizens Association of Georgetown & Burleith Citizens Association, Washington, DC, 2010
- Woodly Park Community Association property owners and ANC 3C, Washington, DC, 2010
- Westbard / River Road Coalition, Bethesda, Md. (2008-2009)
- Friendship Neighborhood Association, Washington, DC (2007)
- Sibley Neighbors for Responsible Growth, Washington, DC (2007)
- Eckington Citizens for Responsible Development, Washington, DC (2007)
- Tilden Street Neighbors, Washington, DC (2006)
- Foggy Bottom Association, Washington, DC (2005-2008)
- Watergate Cooperatives – East/West, Washington, DC (2003-2004)
- Q Street Neighborhood Association, Washington, DC (2003)
- Friendship Heights Org. for Responsible Development, Washington, DC (2002)
- Penn-Branch Citizens/Civic Association, Washington, DC (2001)
- Tenleytown Neighbors Association, Washington, DC (2000)
- McKissack & McKissack Architects, Washington DC (NIH Day Care & Fire Station 1999)
- Wisniewski Blair Associates Ltd. Architects, Alexandria, Va. (Suitland Federal Center Security perimeter 1998)
- The Kennedy Center for the Performing Arts, Washington DC (Site & garage additions 1997-1998)

PROFESSIONAL AFFILIATIONS & MEMBERSHIPS

National Coalition to Save Our Mall, Washington DC, Vice President, 2000-present
Trustee/Member, Committee of 100 on the Federal City, Washington, DC, 1996-present
Trustee, DC Preservation League, Washington, DC 1996-2006
American Planning Association, American Institute of Certified Planners, 1964-present
President, National Capital Area Chapter 1970-1972
Lambda Alpha International, 1974-present (Honorary land economics society)
President, George Washington Chapter 1982-1984
The American Society of Landscape Architects,

- Accreditation Board, 1978-1981
- Council on Education, 1981-1984

Site Visit Team, Planning Accreditation Board, American Institute of Certified Planners
Board of Directors, United Planning Organization, Washington, DC, 1967-1979
National Association of Housing and Redevelopment Officials
Metropolitan Committee on Planning, New York, N.Y.
Executive Committee, Council of Social Agencies of Newark, Irvington and West Hudson, New Jersey
Newark Junior Chamber of Commerce, Newark, New Jersey “Outstanding Executive”
New Jersey State Board of Professional Planners, original Board member

**GO Consulting: 11750 Old Georgetown Road, N. Bethesda, Md. 20852
301- 816-1153 Fax: 301- 816-1168 e-mail: goberland@verizon.net**

Burleith Citizens Association

Witness Information

1. Lenore Rubino, President
2. Sheila Hegy, Chair GU Relations Committee
3. Bonnie Hardy, Past President, BCA
4. Edgar Russell
5. Irene and Larry Schaffner

Expert Witnesses

6. George Oberlander, expert on urban planning and development, D.C. zoning and planning policies (CV attached).
7. Joseph Mehra, expert on transportation planning, traffic engineering and parking (CV attached).

Summary of Testimony

The Burleith witnesses will describe the objectionable impacts on the Burleith community caused by Georgetown University, the failure of the Campus Plan to mitigate those objectionable conditions, and why the proposed plan would exacerbate those objectionable impacts because of the proposed increases in enrollment, traffic and parking and other objectionable proposals, including the alignment of the University's Gate 1 on Reservoir Road with 38th Street. The witnesses will describe the adverse impacts caused by Georgetown University's housing policies and transportation plan, and the failure of the Off Campus Student Life Program to address adverse impacts of students living off campus in the community. The witnesses will comment on the hospital expansion plan and discuss the specific changes in the Campus Plan that are required to mitigate the objectionable conditions in Georgetown which the University has created.

George Oberlander will summarize his reasons for concluding that the proposed Campus Plan must be rejected for failure to comply with the relevant regulatory standards for Zoning Commission approval. He will explain the deficiencies in the Plan and how they can be corrected.

Joseph Mehra will testify concerning the Transportation Plan prepared by consultants to Georgetown University and Georgetown University Hospital, and address whether objectionable traffic and parking impacts would be created by the proposed Campus Plan and how they could be mitigated.

Time required: BCA's presentation will take 30 minutes, excluding the testimony of the jointly retained experts who will present their testimony as part of the presentation of The Citizens Association of Georgetown.

Jawahar (Joe) Mehra, P.E. PTOE

President, MCV Associates, Inc

Education

- MS/1972/Industrial Engineering
- BS/1969/Mechanical Engineering

Registration/Certification

- Professional Engineer: TX, VA, MD, DE
- PTOE

Affiliations

- Fellow, Institute of Transportation Engineers
- Member, Transportation Research Board

Summary

Mr. Mehra has over thirty-five years of experience in the areas of project management, traffic engineering and transportation planning. He has managed numerous traffic engineering/operations studies including traffic analysis, impact studies and data collection. He has managed several traffic engineering studies in the Washington DC including the K Street Busway Study, the EISF preparation for Logan Circle residential development, EIS for PEPCO Project, The Bus rapid Transit Study, TIS for various land uses, traffic data collection projects for DDOT, Klingle Road Traffic Study, Field School Traffic Impact Study, etc.

Relevant Experience

Traffic Engineering. He has managed several traffic engineering studies with extensive experience in traffic simulation models such as Synchro, CORSIM and TRANSYT-7F. He managed the traffic analysis study for Fort Meade that used the CORSIM Model to evaluate roadway improvements to accommodate security measures implemented after September 11, 2001. He was also the Project Manager for a three year transportation planning "on-call" contract with VDOT for Region 2. As part of this contract the Tysons Corner area was analyzed using the Synchro model. Approximately 40 signalized intersections were analyzed for the existing conditions and future conditions. CORSIM Model was also used on several other projects to evaluate corridors such as the Route 207 corridor in Caroline County, the Eisenhower Avenue corridor for the Patent and Trademark Office in Alexandria, etc. Other traffic engineering studies that he has managed include the Route 58 (Pennington Gap Bypass) Traffic Engineering Study for VDOT, Route 1/123 Interchange Study, etc.

Transportation Planning/Forecasting. He was the Project Manager for the Dulles Corridor Metrorail Project - Station Traffic Circulation Study For Preliminary Engineering Extension To Dulles Airport / Route 772 to validate the station layouts and the traffic forecasts as they relate to station access issues for the Metrorail Extension. He has conducted statewide, regional, corridor and subarea planning studies in Washington, DC, Fauquier County, Warren County, Fairfax County, Loudoun County (using COG's Version 2 Model and VIPER that resulted in the County's Comprehensive transportation plan), Chesterfield County, Richmond area, Hampton Roads, Tri-Cities, Prince William County, etc. in Virginia; Montgomery County, Baltimore County, St. Mary's County, Charles County, Prince George's County, Germantown, Silver Spring, etc. in Maryland; York County, Pennsylvania; St. Louis, Missouri; Denver, Colorado; New York City, Connecticut, etc. using MINUTP, TMODEL2, EMME/2 or QRSII. He has managed multimodal planning studies for a broad range of clients. He was the Project Director for the New Approach Study for Integrating Transportation and Development in the National Capital Region using the MINUTP model. He was the Principal Investigator of a FHWA study on Analysis and Use of Trip Generation Rates resulting in S.I.T.E. Handbook and updated NCHRP 187 trip rates. He was MCV's Project Manager on a multi-disciplinary team to prepare the Georgetown Branch Transitway MIS in Maryland. He managed the Charles Town Circulation Study and the Leesburg Downtown Courts Transportation Study.

Environmental Planning. He has managed several environmental assessments and impact statements with emphasis on data collection, transportation, air quality, land use and noise using State and Federal guidelines. These studies were performed at regional, local and project levels. Examples include the Georgetown Branch Transitway EIS/MIS, US 1/MD 201 Corridor EIS, etc.



Planning • Engineering • Information Technology



FORM 140 - PARTY STATUS REQUEST



Before completing this form, please review the instructions on the reverse side.

PLEASE NOTE: YOU ARE NOT REQUIRED TO COMPLETE THIS FORM IF YOU SIMPLY WISH TO TESTIFY AT THE HEARING. COMPLETE THIS FORM ONLY IF YOU WISH TO BE A PARTY IN THIS CASE.

(Please see reverse side for more information about this distinction.)

NAME: Last Schaffner		First Lawrence and Irene	Middle I.
ADDRESS: Street 3700 R St, NW	Apt. # (if any)	City Washington	State DC
Zip Code 20007	Phone No. 202-333-8739	Fax No.	E-Mail lschaffner@aol.com

I hereby request to appear and participate as a party.

Signature

Date

Will you appear as a(n)

☐

Proponent

☒

Opponent

Will you appear through legal counsel?

☒

Yes

☐

No

If yes, please enter the name and address of such legal counsel.

NAME: Last Hinds		First Richard	Middle I.
ADDRESS: Street 2000 Pennsylvania Ave, NW	Ste. # (if any) Ste 9000	City Washington	State DC
Zip Code 20006	Phone No. 202-974-1540	Fax No. 202-974-1999	E-Mail rhinds@cgrsh.com

WITNESS INFORMATION:

On a separate piece of paper, please provide the following witness information:

1. A list of witnesses who will testify on the person's behalf;
2. A summary of the testimony of each witness (*Zoning Commission only*);
3. An indication of which witnesses will be offered as expert witnesses, the areas of expertise in which any experts will be offered, and the resumes or qualifications of the proposed experts (*Zoning Commission only*); and
4. The total amount of time being requested to present your case (*Zoning Commission only*).

PARTY STATUS CRITERIA:

On a separate piece of paper, please answer all of the following questions referencing why the above entity should be granted party status:

1. How will the property owned or occupied by such person, or in which the person has an interest be affected by the action requested of the Commission/Board?
2. What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)
3. What is the distance between the person's property and the property that is the subject of the appeal or application before the Commission/Board? (Preferably no farther than 200ft.)
4. What are the environmental, economic or social impacts that are likely to affect the person and/or the person's property if the action requested of the Commission/Board is approved or denied?
5. Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the Commission/Board is approved or denied.
6. Explain how the person's interest will be more significantly, distinctively, or uniquely affected in character or kind by the proposed zoning action than that of other persons in the general public.

Except for the applicant, appellant or the ANC, to participate as a party in a proceeding before the Commission/Board, any affected person shall file with the Zoning Commission or Board of Zoning Adjustment, this Form 140 not less than fourteen (14) days prior to the date set for the hearing.

January 22, 2011

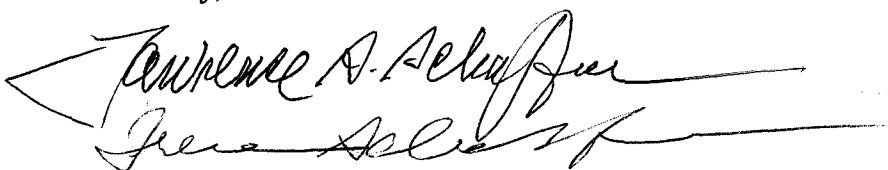
DC Office of Zoning
441 Fourth Street, NW
Suite 200 S
Washington, DC 20001

RE: Case No. 10-32, Georgetown University Campus Plan 2010-2020

In accordance with DC Zoning Regulations (11DCMR 3106.2) this letter serves as a request to appear and participate as a party in this case. We shall be represented by the Burleith Citizen's Association and its counsel and agree that said Association and its counsel shall have the power to bind us in this case.

- (a) **Name and Address:** Irene and Larry Schaffner. 3700 R St, NW, Washington, DC 20007. Located in the community of Burleith.
- (b) **Request to appear and participate as a party:** This letter serves as the formal request for Irene and Larry Schaffner to appear and to participate as a party in Case No. 10-32
- (c) **Position on the Application:** Opponent
- (d) **Legal Counsel:** Richard Hinds, 2000 Pennsylvania Ave, NW, Ste 9000, Washington, DC 20006.
- (e) **Witnesses who will testify on the persons behalf:** Representatives of the Burleith Citizens Association.
- (f) **Statement as to why party status should be granted:** We are the owners and residents of 3700 R St, which is located one block from the Georgetown University campus. The Georgetown University Campus Plan will adversely affect us in several ways. We are surrounded by group houses occupied by Georgetown University students. Because of our location in Burleith at the corner of R and 37th Streets we have large groups of students walking back and forth from campus to neighborhood parties at all hours of the night in various stages of drunkenness, loudness and improper behavior. Our corner is often the staging area for large student gatherings at all hours of the night that require MPD intervention. The quiet enjoyment of our home to which we are legally entitled and a decent night's sleep have been violated. The present level of trash, litter and noise attributable to on and off campus students is unacceptable. Any increase in the student population will lead to an increase in off campus student housing that will exacerbate the already deteriorating environment and the economic value of our owner occupied residence will be reduced. As evidenced by existing conditions, Georgetown University has been unwilling to correct the current objectionable conditions it has created. It should be required in this proceeding to adopt a Plan that does correct them.

Sincerely,

A handwritten signature in black ink, appearing to read "Irene Schaffner", is written over a horizontal line. The signature is stylized and cursive.



FORM 140 - PARTY STATUS REQUEST



Before completing this form, please review the instructions on the reverse side.

PLEASE NOTE: YOU ARE NOT REQUIRED TO COMPLETE THIS FORM IF YOU SIMPLY WISH TO TESTIFY AT THE HEARING. COMPLETE THIS FORM ONLY IF YOU WISH TO BE A PARTY IN THIS CASE.

(Please see reverse side for more information about this distinction.)

NAME: Last Russell		First Edgar	Middle I. F.	
ADDRESS: Street 3705 Reservoir Road, NW		Apt. # (if any)	City Washington	State DC
			Zip Code 20007	
Phone No. 202-333-8456		Fax No.	E-Mail edgar_russell@hotmail.com	

I hereby request to appear and participate as a party.		Signature	Date
Will you appear as a(n)	☐ Proponent ☒ Opponent	Will you appear through legal counsel?	☒ Yes ☐ No

If yes, please enter the name and address of such legal counsel.

NAME: Last Hinds		First Richard	Middle I.	
ADDRESS: Street 2000 Pennsylvania Ave, NW, Ste 9000		Ste. # (if any)	City Washington	State DC
			Zip Code 20007	
Phone No.		Fax No.	E-Mail	

WITNESS INFORMATION:

On a separate piece of paper, please provide the following witness information:

1. A list of witnesses who will testify on the person's behalf;
2. A summary of the testimony of each witness (*Zoning Commission only*);
3. An indication of which witnesses will be offered as expert witnesses, the areas of expertise in which any experts will be offered, and the resumes or qualifications of the proposed experts (*Zoning Commission only*); and
4. The total amount of time being requested to present your case (*Zoning Commission only*).

PARTY STATUS CRITERIA:

On a separate piece of paper, please answer all of the following questions referencing why the above entity should be granted party status:

1. How will the property owned or occupied by such person, or in which the person has an interest be affected by the action requested of the Commission/Board?
2. What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)
3. What is the distance between the person's property and the property that is the subject of the appeal or application before the Commission/Board? (Preferably no farther than 200ft.)
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5. Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the Commission/Board is approved or denied.
6. Explain how the person's interest will be more significantly, distinctively, or uniquely affected in character or kind by the proposed zoning action than that of other persons in the general public.

Except for the applicant, appellant or the ANC, to participate as a party in a proceeding before the Commission/Board, any affected person shall file with the Zoning Commission or Board of Zoning Adjustment, this Form 140 not less than fourteen (14) days prior to the date set for the hearing.

February 1, 2011

DC Office of Zoning
441 Fourth Street, NW
Suite 200 S
Washington, DC 20001

RE: Case No. 10-32, Georgetown University Campus Plan 2010

In Accordance with DC Zoning Regulations (11DCMR 3106.2) this letter serves as a request for party status in the above - cited application and as authorization for me to be represented by the Burleith Citizens Association ("BCA") and its counsel. I understand that BCA and its counsel has the power to bind me in this case.

(a) Person's Name and Address: Edgar F. Russell, III, 3705 Reservoir Road, NW, Washington, DC 20007. Located in the community of Burleith.

(b) Request to appear and participate as a party: This letter serves as the formal request for Edgar F. Russell, III to appear and to participate as a party in Case No. 10-32, represented by BCA and counsel.

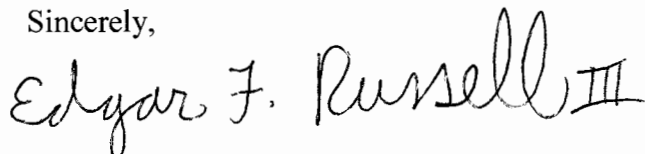
(c) Position on the Application: Opponent

(d) Legal Counsel: Richard Hinds, 2000 Pennsylvania Ave, NW, Ste 9000, Washington, DC 20006, ph. 202-974-1540

(e) Witnesses who will testify on the persons behalf: Burleith Citizens Association

(f) Statement as to why party status should be granted: I am the owner and resident of 3705 Reservoir Rd, located directly across from the Georgetown University campus. The 2010 Campus Plan will adversely affect me in several ways distinct and different from persons in the general public. As a U.S. Air Force officer (now retired), I have lived in various places in the U.S. and overseas but Burleith was the area where I grew up and lived from 1954 to 1977 and from 1993 to the present. In the interim period I returned to visit my parents many times over the years and observed what I write about personally. Up until the late 1970s and early 1980s Burleith was primarily a family neighborhood of owner occupied homes. Since then most of Reservoir Road and R Street have become Georgetown student rentals. I am surrounded by students living across the alley and as abutters where the rental houses are rundown and trash overflows. Growing up I rarely saw a rat in the neighborhood. Now I see rats running across the alley and between houses frequently. Many landlords have demolished the one-car garages to make room for student cars—often as many as six which fill their backyards and spill over into the alley making it difficult to pass or to park. Many times thoughtless students have also parked in front of my garage; making it impossible to get out. I must bang on many different back doors to find the students responsible. The behavior of the students surrounding me over the last ten years has been completely unacceptable. I am legally entitled to the quiet enjoyment of my residence and therefore should not have to tolerate this pattern of behavior by Georgetown students.

Sincerely,

A handwritten signature in cursive script that reads "Edgar F. Russell III". The signature is written in dark ink and is positioned above the printed name.

Edgar F. Russell III