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CASE NO. 10-32
EXHIBIT NO. 25



Georgetown University
2010-2020 Campus Plan
Pre-Hearing Submission

March 31, 2011

I. Summary

Georgetown University's 2010 Campus Plan emphasizes academic excellence, strong campus community life, and a continued desire to be a good neighbor and an asset to the District – all within the financial constraints faced by a top-tier university with far fewer endowment assets than its peer institutions. This submission supplements and amends the 2010 Campus Plan as filed on December 30, 2010 by:

- making significant new commitments in direct response to the community, the Office of Planning and the District Department of Transportation; and
- conveying additional data and information in support of various aspects of the Campus Plan.

To summarize, as a result of engagement with the community, the Office of Planning and the District Department of Transportation, the University's 2010 Campus Plan now proposes significant concessions with the goal of framing a compromise that, if adopted in all respects, would be acceptable to the University. The new proposal would:

- Freeze undergraduate enrollment at currently-permitted levels;
- Adopt a voluntary Main Campus total enrollment maximum;
- Add a total of 250 beds either on-campus or elsewhere in the region;
- Locate 1,000 School of Continuing Studies students at satellite locations;
- Reduce the previously-proposed Main Campus total enrollment maximum of 16,133 to 15,000;
- Restrict the use of Kehoe Field; and
- Build an internal loop road to improve University-provided bus service and route buses off of neighborhood streets.

Also as a result of community and D.C. agency engagement, the University has withdrawn initial proposals to:

- Add 1,000 parking spaces;
- Construct student housing on the 1789 block within campus boundaries;

- Build a convocation center; and
- Extend the height of the chimney at the University's heating and cooling plant.

The 2010 Campus Plan as now proposed carefully balances the University's various interests (such as advancing academic excellence and the University's mission, continuing the University's service to the local community, and sustaining its comparatively limited financial resources) with measures that would address the community's concerns. Accordingly, the University's support of the conditions and related elements of the proposed 2010 Campus Plan is expressly predicated on adoption of all elements of the 2010 Campus Plan, which are mutually interdependent on one another.

The University's proposed conditions to approval of the 2010 Campus Plan are set forth at Exhibit A.

For the reasons set forth in the 2010 Campus Plan, Georgetown University respectfully submits that the 2010 Campus Plan as amended and supplemented by this submission (the "2010 Campus Plan") meets applicable legal requirements and will not be objectionable due to noise, traffic, number of students or other objectionable impacts.

II. Georgetown Will Commit to Supplement Its Already-Significant Number of Student Beds by an Additional 250 Beds

Georgetown University has historically housed a higher portion of its undergraduate student body than any other university in the District, with the exception of Gallaudet University, setting a benchmark for on-campus student housing. Similarly, the portion of the Georgetown undergraduate student body housed by Georgetown compares very favorably to publicly-available student housing information from other urban universities. The University remains committed to being among the leaders in this area, and as part of the 2010 Campus Plan, proposes to increase even further the number of undergraduate students housed in University housing.

Even though in the past several decades Georgetown has added large numbers of beds on campus and even though the University's housing capacity compares favorably with urban universities locally and elsewhere, Georgetown has nonetheless listened to the concerns of its neighbors and has responded by analyzing the Main Campus in a variety of ways to identify feasible additional University housing. In an effort to secure the most creative thinking, not only did the University use internal resources, the University also separately engaged two consulting firms to conduct independent analyses.

The University's initial proposal to add housing in the 1789 block was withdrawn after negative neighborhood feedback. **In light of further neighborhood feedback, and in the**

context of the 2010 Campus Plan as a whole, Georgetown will commit to providing 250 new undergraduate beds either on campus or outside of the residentially-zoned land within Zip Code 20007. *See* Proposed Conditions at Exhibit A. Georgetown notes, however, that as with other aspects of its compromise proposal, this feature particularly could not be lawfully imposed by the Commission absent the University's consent.

III. Georgetown's Off Campus Student Life Program Reduces Objectionable Impacts

A. The Off-Campus Student Life Program is Proactive and Comprehensive.

The University's innovative, comprehensive and effective Off Campus Student Life program is a significant factor in helping prevent objectionable impacts on neighboring communities. Georgetown offers one of the most robust Off Campus Student Life programs in the nation, which has been purposefully designed to minimize impacts of student presence and behavior on the surrounding neighborhoods. This program – involving considerable effort and expense, and initiated voluntarily by the University on its own initiative – has proven to be effective since the program was implemented.

Highlights of Georgetown's proactive approach to address student impacts through programming include:

- A proactive and affirmative presence in the neighborhood which includes:
 - Student Neighbor Assistance Program (SNAP) patrols: a patrol of neighborhood streets by trained student affairs professionals and security personnel during weekend evenings (*see* Exhibit B, page 4); and
 - Community advisors: two student affairs professionals who reside in Burleith and West Georgetown for the purpose of facilitating positive interactions between neighbors and students, leading educational programming and otherwise mitigating impacts;
- Three additional off duty Metropolitan Police Department ("MPD") officers, funded by the University, to patrol neighborhood streets (known as the "reimbursable detail") (*see* Exhibit B, page 6)
- Trash pick up, snow removal and neighborhood beautification efforts (*see* Exhibit B, pages 3-4);
- A shuttle service which provided rides to more than 13,500 riders during Fall semester 2010, reducing foot and motor vehicle traffic on neighborhood streets;

- Comprehensive educational programs designed to teach students about their responsibilities as neighbors and to provide them with resources to fulfill those responsibilities (*see Exhibit B*, pages 2 – 7); and
- Swift and appropriate student conduct responses to behavioral issues, which include increasingly serious sanctions for repeat violations.

Georgetown has committed to continuing this programming, and to regular reporting to the community. Among other things, the University holds monthly meetings with the community (Alliance for Local Living) and provides regular written communications. The report attached as Exhibit B is an example of the type of communication the University has offered and intends to continue.

B. Recent Data Demonstrates the Effectiveness of the Off-Campus Student Life Program.

The recently-implemented Off Campus Student Life initiatives described above have already proven to be effective in reducing instances of off-campus misconduct. Exhibit C contains information regarding “interactions” involving residences where current Georgetown students reside (“Student Residences”). It is important to note that reported “interactions” include proactive SNAP contacts designed to prevent problems before they occur as well as a call to MPD or the GU Hotline.

Even with this rather broad definition of an “interaction,” as reflected in Exhibit C, after implementation of the University’s Off Campus Student Life initiatives:

- A very large percentage of Student Residences had with **no** reported interactions; and
- Very few Student Residences had multiple interactions (fewer than one percent (1%) of Student Residences had more than two interactions).

The number of Student Residences with three or more reported interactions decreased to only 1% in Fall 2010. In other words, the number of problem-free Student Residences remains notably high and the number of repeated problem Student Residences remains notably low.

Notwithstanding Georgetown’s SNAP, Hotline and other resources, community leadership has encouraged local residents to report minor disturbances by calling 911. Having devoted substantial resources to efforts such as SNAP intended to address issues immediately, the University is unable to maximize its response if community members sidestep – if not actively undermine – these efforts. MPD records such 911 reports as “disorderly conduct” calls.

Attached as Exhibit D is an analysis of calls to 911 regarding “disorderly conduct” in PSA 206 over the past three calendar years, along with representative street-by-street information, which shows:

- Even with community leaders urging neighbors to report issues to 911, the number of calls to 911 for reports of “disorderly conduct” in West Georgetown and Burleith has decreased steadily and substantially over the past three years;
- Calls for the West Georgetown and Burleith neighborhood are a fraction of the total number of calls for the entire PSA, which also includes the popular commercial districts along M Street, Wisconsin Avenue and the Georgetown waterfront; and
- Calls are declining among many key streets, particularly those with high concentrations of students such as Prospect Street, O Street and the 1200 to 1400 blocks of 36th Street.

Thus, even measured against an independent metric, Georgetown’s Off Campus Student Life initiatives are addressing and managing potential off-campus student impacts.

IV. Georgetown Will Commit to Locating 1,000 School of Continuing Studies Students at a Satellite Location and Will Agree to a Related Reduction in the Overall Voluntary Enrollment Maximum

In the initial 2010 Campus Plan filing, Georgetown committed to identify and pursue opportunities to establish satellite locations for some continuing studies programs, particularly in mass transit-oriented locations. Those efforts continue.

Even though the University has not settled on such locations and despite the related uncertainties, Georgetown will commit to locate 1,000 School of Continuing Studies students off campus. In addition and notwithstanding the significant financial implications for the University, Georgetown will also reduce its initially-proposed total enrollment maximum of 16,133 students (calculated as further described in the 2010 Campus Plan) to a voluntary overall enrollment maximum of 15,000 students (using those same calculations). Both of these commitments, like the University’s other commitments in the 2010 Campus Plan, are made in the context of the overall 2010 Campus Plan and are interdependent and predicated upon adoption of all of the elements of the Plan. See Proposed Conditions at Exhibit A. Further details regarding the proposed voluntary enrollment maximums are set forth below.

V. For the First Time Georgetown Will Commit to Voluntary Overall Enrollment Maximums

Georgetown's mission – and the funds needed to fulfill that mission – are dependent on students and related tuition revenues. Any enrollment limit necessarily limits the University's operating funds. The 2010 Campus Plan reflects, among other things, the University's careful balancing of factors affecting the University's financial viability with responsiveness to community concerns. As a result, the University's willingness to move forward with the commitments in the 2010 Campus Plan, including, in particular, voluntary enrollment maximums – for the first time in its history and notwithstanding the financial implications and significant management challenges that an overall voluntary maximum imposes – is expressly predicated on adoption of all of the elements of the 2010 Campus Plan.

Given the clear prohibition under the District of Columbia Human Rights Act against discrimination in housing based on matriculation, *see* D.C. Code § 2-1402.21, the University views any enrollment cap as a significant concession. Moreover, as the District of Columbia Court of Appeals stated in 2003: “we are of the opinion that the imposition of an enrollment cap at least approaches (if, indeed, it does not cross) the line between the exercise of legitimate zoning and land use authority and an *ultra vires* intrusion upon the University's educational mission.” *Pres. and Dirs. of Georgetown College v. District of Columbia Bd. of Zoning Adj.*, 837 A.2d 58, 74-75 (D.C. 2003).

A. Georgetown Has Complied With 2000 Campus Plan Enrollment Levels.

In the 2000 Campus Plan, Georgetown University predicted that the Main Campus student population would reach a total of 10,000 students. This prediction was based on the methodologies in place for calculating student enrollment under the 2000 Campus Plan, which calculated graduate school enrollment based on “financial full-time equivalent” status, rather than on a headcount basis. As shown on Exhibit E, the University has complied with these projections. In academic year 2009-2010, the Main Campus student population totaled 9,860 students using the 2000 Campus Plan methodologies.

B. Georgetown Proposes a Simplified, Transparent Enrollment Methodology.

In the 2010 Campus Plan, the University has proposed a simpler and more transparent methodology for calculating the overall number of students. The University's “Main Campus Student Headcount” will consist of the total number of students reported under the federally-mandated Integrated Postsecondary Education Database System (“IPEDS”) headcount system, less the number of students enrolled at a program based at a location other than the Main Campus. This approach, which counts only the number of students with a “primary relationship”

to the campus, has been previously affirmed by the Zoning Commission. *See* Z.C. Order No. 06-11B/06-12B at 9 (2010).

IPEDS-based methodology has been proposed for a number of reasons:

- All universities nationwide report student enrollment numbers under the IPEDS system; it is a recognized, understood, widely-utilized and transparent way of reporting student enrollment;
- IPEDS-based enrollment measures will be easier for Georgetown to implement because the IPEDS numbers are required to be generated and reported for other purposes; and
- Such a widely-utilized and transparent measure will be understandable and will assist District officials in monitoring Georgetown's compliance with voluntary enrollment maximums.

Shifting to the IPEDS methodology, however, initially will result in reported enrollment numbers that appear larger simply because of application of the new IPEDS definitions (which, for example, include part-time students). Additionally, because shifting to the IPEDS methodology will increase reported enrollment numbers, the reported percentage of University beds provided for IPEDS enrolled students will be lower, even though the number of actual beds has not changed and even though the actual number of students eligible for housing has not changed.

C. The Proposed Increase in Graduate Student Enrollment With Level Undergraduate and Medical School Enrollment Should Not Adversely Impact the Neighborhood.

- 1. Increased graduate and School of Continuing Studies enrollment should not result in more Georgetown students living in the neighborhood.*

Even though Georgetown's graduate student enrollment increased significantly during the 2000 Campus Plan period, the number of graduate students living in local neighborhoods remained relatively stable. Bolan Smart Associates, engaged to evaluate the potential impact of the proposed graduate student enrollment increase, looked specifically at the West Georgetown and Burleith neighborhoods. Bolan Smart's report, attached as Exhibit I, graphically illustrates the increase in the graduate and School of Continuing Studies enrollment from 2000 to 2010, with limited associated increase in graduate and Continuing Studies student population living in West Georgetown and Burleith. *See* Exhibits 1 and 2 of the Bolan Smart report at Exhibit I.

University students in a graduate or School of Continuing Studies program have an average age of 30 or older, and a majority live in Arlington County or elsewhere in the District, rather than in areas proximate to Main Campus. *See Exhibit F.* Additionally, because many graduate and Continuing Studies students are part-time, they typically already live elsewhere in the D.C. metropolitan area and have little incentive to relocate closer to Georgetown. *See Exhibits F and I.* The Bolan Smart report notes these demographic characteristics, concluding that “there are important differences between undergraduate and graduates in terms of housing preferences that limit the potential impact of additional graduate students on the background housing market.” *See Exhibit I.*

That the University projects the highest growth in part-time Continuing Studies students in particular is another factor that will mitigate the possibility of neighborhood-related impacts of an increase in graduate and Continuing Studies enrollment. Historically, between 79% and 87% of the School of Continuing Studies students have been part-time. *See Exhibit I* at page 10. Approximately 60% of the proposed growth in the School of Continuing Studies is expected to be in part-time students – students who are not likely to live near or move close to Main Campus, who tend to be older and, as described below, to live alone rather than in group houses.

Accordingly, based on historical evidence, the demographic characteristics of the student population targeted for growth and local real estate market factors, enrolling more graduate and Continuing Studies students, should not result in more Georgetown students living in the surrounding neighborhoods.

2. *Because graduate students generally do not create conduct problems, proposed increases in graduate enrollment should not increase off-campus conduct concerns.*

As proposed, the 2010 Campus Plan would permit a modest increase in graduate student enrollment with no increase in undergraduate or medical school enrollment. As noted above, graduate students tend to be older and to live further from campus, reducing the potential for local neighborhood conduct issues.

Indeed, the University’s experience is that graduate students typically do not create off-campus conduct issues. In fall 2010, for example, only six graduate student residences (or 4% of all graduate student residences) were associated with calls to or visits from SNAP, MPD or the GU Hotline. Only **one** graduate student address was associated with a repeated interaction. *See Exhibit H.*

Graduate and Continuing Studies students who do live in the vicinity of Main Campus tend not to live in group houses, another factor that reduces the potential for neighborhood concerns. Two-thirds (66%) of University students in a graduate or School of Continuing

Studies program who live in zip code 20007 (encompassing the residential neighborhoods surrounding Main Campus) live by themselves. *See Exhibit G.*

These facts are consistent with the Bolan Smart findings, which include a finding that graduate students are not likely to live in group houses and a further finding that economic conditions do not create financial incentives for the conversion of existing housing stock to group houses. *See Exhibit I.* Bolan Smart's report concludes that the proposed enrollment increase reflected in the 2010 Campus Plan would result in few, if any additional group houses.

3. Increased Georgetown graduate and School of Continuing Studies enrollment should not have other detrimental effects on the neighborhood.

From 2000 to 2010, while Georgetown student enrollment increased, Burleith and West Georgetown experienced a significant increase in family residences with children and in owner-occupied households. *See Exhibit I.* During that period, the percentage of family households with children more than doubled both in Burleith and West Georgetown. Owner-occupied homes in those neighborhoods increased as well during that period. More specifically from 2000 to 2010:

- in Burleith:
 - households with children increased from 12% of the total to 31% of the total; and
 - owner-occupied homes increased by 6% to 64% of total residences; and
- in West Georgetown:
 - family households with children increased from 12% to 35% of the total; and
 - owner-occupied homes increased by 4% to 60% of the total.

See Exhibit I. The increase in University enrollment during that period clearly had no adverse impact on the desirability of these neighborhoods for either homeowners generally or families with children. To the contrary, these neighborhoods appear to have attracted more owner-occupants and families.

For the reasons described above, additional graduate and Continuing Studies students are unlikely to impose objectionable impacts on the surrounding community.

4. *Deeming Georgetown students ineligible to live in a neighborhood or restricting students to residing within an area based on student status is impermissibly discriminatory.*

While understanding that Georgetown University, like virtually any other university, continues to face challenges involving some student conduct, the notion that *all* of its students should be denied housing in a particular area, or be limited to housing within a particular area, just because they are Georgetown University students, as some have suggested, is facially discriminatory and unlawful.

VI. Georgetown's Transportation Demand Management Initiatives Reduce Objectionable Impacts

A. Outside consultant reports support the effectiveness of Georgetown's existing and proposed Transportation Demand Management initiatives.

In addition to the information about the University's existing and proposed Transportation Demand Management initiatives included in the initial 2010 Campus Plan filing, several additional transportation-related reports are attached as Exhibits J, K, and L. These reports underscore the effectiveness of Georgetown's Transportation Demand Management Initiatives in reducing potential objectionable impacts. Included are:

- a Transportation Report (Exhibit J) and a Technical Analysis (Exhibit K) prepared by Gorove/Slade Associates, the University's transportation consultant, detailing the traffic and parking impacts of the proposed Campus Plan, submitted to the District Department of Transportation and the Office of Planning on March 16, 2011 and made available to the public and hand-delivered to ANC 2E on March 17, 2011; and
- an additional report prepared by O.R. George & Associates, MedStar's transportation consultant (Exhibit L) made available by Georgetown on March 21, 2011 in response to a request from ANC 2E.

Among other things reflected in these reports is the efficacy of the University's efforts to reduce single-occupancy vehicle trips to and from campus. Over 60% of Georgetown's students, faculty, and staff—including 96% of undergraduate students and 75% of graduate students—arrive by means other than private automobile. See Exhibit J. This mode split, particularly for students, is comparable to non-auto use at other D.C. universities that are located closer to Metrorail. For instance, George Washington University, which is located at the Foggy Bottom-GWU Metrorail station, recently reported that 79% of its students arrive by means other than private automobile.

B. The proposed on-campus “loop road” will reduce the traffic impact of Georgetown GUTS buses in the neighborhoods.

Georgetown’s initial 2010 Campus Plan filing included a proposal for a road along the western end of campus that would create an on-campus loop to facilitate bus turnarounds. This submission contains additional information regarding the “loop road,” which is set forth below and in Exhibit M. As previously noted, full implementation of the on-campus loop road will require cooperation from both federal and District agencies.

Illustrations included in Exhibit M demonstrate that the proposed loop road will not encroach on a National Park Service “scenic easement” and generally will not be visible from within or across the adjacent park.

In considering the loop road, Georgetown and its planning and traffic consultants evaluated all existing campus roadways and surface parking lots to compare multiple potential alternative approaches for an on-campus bus turnaround. Other alternatives were ultimately not selected because (1) safety risks to pedestrians could not be mitigated, (2) service would be critically affected, or (3) the design could not accommodate the needed bus maneuverability. Specifically:

- A loop alternative using the West Road and Tondorf Road was eliminated because GUTS buses would be required to traverse pedestrian-heavy areas near the Leavey Center/Hospital and along Tondorf Road in the center of campus. The narrow roadway that passes between the Leavey Center and the Hospital, in particular, includes a high number of hospital patients, and the entrances to the Lombardi Cancer Center and Leavey Conference Center preclude widening of the road.
- A turnaround on the south end of campus was eliminated because the design could not accommodate the required turning radius. In addition, such a turnaround would be quite remote from the majority of the campus, and in particular the Hospital.
- A turnaround on the north end of campus (north of the Leavey Center) was eliminated, among other reasons, because GUTS buses would be required to turn around in the pedestrian-heavy area near the Leavey Center and Hospital.
- Loop alternatives requiring buses to exit and re-enter the campus using Reservoir Road were eliminated because of traffic concerns along Reservoir Road.

- A loop alternative requiring buses to exit the campus on Reservoir Road and proceed to their stops via Foxhall Road was similarly eliminated because of traffic concerns.
- A final alternative combining the Dupont and Rosslyn routes into a single route that would turnaround at each station was eliminated because such a route would require additional buses, continue to require buses to pass through neighborhood streets in West Georgetown and would face scheduling challenges.

Georgetown also investigated the feasibility of utilizing a turntable system, but the alternative was ruled out because no space on campus was large enough to accommodate the required equipment and the amount of time to turn the number of buses would likely cause significant traffic backups.

C. Georgetown will agree to restrictions on the use of Kehoe Field; the proposed enclosure will reduce noise and light and will be largely obscured year-round.

As reflected in proposed conditions at Exhibit A, to address neighbor concerns, Georgetown is willing to agree to restrictions on the use of Kehoe Field

Included in Exhibit N are photo illustrations of the conceptual enclosure over Kehoe Field, showing that, even in during winter months, the proposed enclosure would be largely obscured by the park. Furthermore, the enclosure would reduce impacts related to noise and, during the evening hours, lights on the field.

CONCLUSION

For the reasons set forth in Georgetown University's initial filing of its 2010 Campus Plan and in this submission and supported by the respective accompanying materials, the 2010 Campus Plan fully satisfies the requirements of the Zoning Regulations.

Table of Exhibits

Exhibit A	Proposed Conditions
Exhibit B	Off Campus Student Life, Fall 2010 Semester Report
Exhibit C	MPD and SNAP Interaction with Off-Campus Addresses
Exhibit D	Disorderly Conduct Call Analysis
Exhibit E	Compliance with 2000 Plan Enrollment Levels
Exhibit F	Graduate Student Demographic Information
Exhibit G	Graduate Student Occupancy Information
Exhibit H	Graduate Student Conduct Information
Exhibit I	Bolan Smart Report
Exhibit J	Gorove/Slade Transportation Report
Exhibit K	Gorove/Slade Technical Analysis
Exhibit L	O.R. George & Associates Report
Exhibit M	Loop Road Plans and Sections
Exhibit N	Kehoe Enclosure Representation
Exhibit O	Testimony Outlines
Exhibit P	Expert Resumes