

**RESPONSE TO OFFICE OF PLANNING SUPPLEMENTAL REPORT
BY GEORGETOWN UNIVERSITY
Z.C. CASE NO. 10-32**

JANUARY 13, 2012

RECEIVED
D.C. OFFICE OF ZONING
2012 JAN 13 PM 2:46

I. ACTUAL HOUSING DATA CONFIRM FEWER TOTAL STUDENT RESIDENCES AND FAR FEWER GROUP HOUSES THAN THE ANALYSIS BY THE OFFICE OF PLANNING (“OP”) SUGGESTS

A. OP Maps Include Homes with Basement Apartments, Which Have Proved Non-Problematic, and Graduate Students Who Are Rarely the Source of Noise and Other Disturbances

1. OP Improperly Includes Basement Apartments

OP continues to overstate the number of Georgetown University (“Georgetown” or the “University”) student houses in the surrounding neighborhoods in its December 22, 2011 Supplemental Report (“Supplemental Report”). OP’s newly-filed maps of the Foxhall and Hillandale neighborhoods, as well as the corrected maps of the Burleith and West Georgetown neighborhood, continue to suggest that a high percentage of addresses in each neighborhood are student “group houses.”

In reality, many addresses identified by OP as “student addresses” are owner-occupied homes where only one or two students live in a basement apartment. The parties in opposition recognized this point as well, noting that almost 40% of the student addresses in Burleith were basement apartments and over 60% of the student addresses in West Georgetown were either basement apartments or other types of apartments. (Exhibit 245.) As the parties have also noted, students who live in such apartments do not have adverse impacts:

“[I]t is noteworthy that such apartments have seldom been the source of loud parties, public drunkenness and associated misdemeanors.” Lenore Rubino in the *Burleith Bell*, January 2011

Indeed, one of the ANC commissioners acknowledged at the May 16th public hearing that he has been renting out his basement apartment to students for several years. (Tr. May 16, 2011, p. 209.)

2. OP Improperly Includes Graduate Students

Further, the student residences identified on OP's maps also include addresses with graduate students. Again, the record is clear that graduate students have little or no impacts. Graduate students are older, prefer to live alone, and do not tend to cluster in "group houses." The few graduate students that do live in the surrounding neighborhoods are rarely, if ever, the source of any noise or behavior complaints. For similar reasons, the BZA, in connection with the University's 2000 Campus Plan, found that an "increase in graduate enrollment would have only limited impacts and would not tend to create objectionable conditions." (BZA Order No. 16566-F, p. 15.)

B. More Specific Data Reflect Actual Residency Patterns Not Associated with Adverse Impacts

Using the same data as OP, the University separated out addresses with only one or two students as well as graduate students residences to provide a more accurate portrayal of the number of student "group houses." As reflected in Exhibit A¹, the numbers of actual group houses is significantly lower than OP's presentation would suggest. Indeed, the vast majority of neighborhood blocks contain low percentages of group houses.

The "closeup" maps submitted by OP also fail to account for all student apartment units in each square. OP does acknowledge that some of the units are in apartment buildings; OP does not identify, however, the many other student addresses in these blocks that are other types of apartments, such as basement apartments or apartments over ground-floor retail uses. For example, in Square 1228 (OP Supplemental Report, page 5), 5 of the 13 "houses" identified by OP are either apartment buildings, owner-occupied houses where a student lives in a basement apartment, or commercial buildings where a student lives in an apartment above the ground-floor retail use.

C. The Total Number of Students in Nearby Neighborhoods Has Declined

Despite statements to the contrary, the facts show that the aggregate number of students living in the surrounding neighborhoods is down over the past decade. And the number of undergraduates – the group of most concern – is notably down. Attached as Exhibit B is the chart filed in the record on November 17th. Particularly when set against overall increases in population in these neighborhoods, and as reflected in Census data, Georgetown University students were a smaller percentage of the population in 2010 than they were in 2000. During

¹ The University similarly recalculated its numbers to verify accuracy, and the attached maps have been updated to reflect the correct calculations.

this same time period, homeownership rose, property values increased and the number of families with children increased.

II. GEORGETOWN HAS NOT REQUESTED AN INCREASE IN UNDERGRADUATE ENROLLMENT

In the Supplemental Report, OP states that OP is not proposing a no-growth stance but rather recommending:

“an increase in undergraduate enrollment in a way that will allow the University to have control over student behavior...”

On the contrary, it is the University that is voluntarily proposing a no-growth stance, contingent on approval of the 2010 Campus Plan (“2010 Plan”) as proposed. The University has committed to hold undergraduate enrollment at the limit approved in the 2000 Campus Plan – no increase in undergraduate students. Indeed, the University agreed to this voluntary limitation early in its discussions with the community and OP and well before the filing of the 2010 Plan.

OP’s recommendations in OP’s initial May 12, 2011 report (the “Initial Report”) were decidedly no-growth, and included rollbacks in enrollment for both undergraduate students (where the University has voluntarily committed to no growth) and for graduate and nontraditional students (where the University has proposed measured growth and has voluntarily agreed to an overall maximum).

III. GEORGETOWN UNIVERSITY IS SIGNIFICANTLY MORE REGULATED AND PROACTIVE IN CONTROLLING ADVERSE IMPACTS THAN OTHER INSTITUTIONS

A. DC’s Regulatory Requirements are More Stringent than Cambridge.

As OP discusses in its Supplemental Report, the approval process and requirements for colleges and universities in Cambridge is markedly different than the District of Columbia. To highlight, in Cambridge:

- Universities are permitted as a matter of right within the institutional zone district;
- Neither enrollment nor staff headcount is limited by municipal government;
- Universities are not required to provide a certain amount of student housing; and
- Universities are not responsible for the off-campus behavior of their students.

Compared with universities in Cambridge, universities in the District of Columbia are significantly more regulated and restricted. Among other limits, the District mandates a two-stage approval process that imposes extensive conditions to such approvals. Through these conditions (and unlike Cambridge), the District restricts enrollment, requires students housing, and mandates that universities actively manage the off-campus behavior and impacts of their students.

B. Georgetown Leads Its Peers In Providing Housing and Managing Off-Campus Student Impacts.

When compared to peer universities, Georgetown is a leader in both the percentage of students housed on campus and its commitment to effective off-campus student life policies and programs. As OP itself noted, “Georgetown houses a higher percent of undergraduates on campus or in campus housing than most universities in the District of Columbia.” Furthermore, as the University already has demonstrated, Georgetown also houses more students than all but three of ten peer competitors, notwithstanding the University’s significantly smaller endowment. *See Exhibit C.* Based on regular discussions of “best practices” on off-campus student life with peer institutions, Georgetown has the most comprehensive Off Campus Student Life Program of all of these peers. *See Exhibit D.*

OP continues to provide selective comparative information regarding on-campus housing at other universities. Not only is the OP information inaccurate in several respects, but OP’s examples are limited to universities with mandatory student housing rules, which (1) actually do not require all students to live on campus for all four years and (2) can be distinguished by either the facts or unique situations.

For example, the University of Chicago comparison contains factual inaccuracies and is otherwise flawed. **As the University already has demonstrated and confirmed, the University of Chicago does NOT require all undergraduates to live in university-provided housing.** Only 55% of the University of Chicago’s undergraduates live in university housing, as shown on *Exhibit C* and as reflected on the university’s website, which includes fact sheets for students and parents about off-campus housing and contact information for off-campus property management companies. *See Exhibit E.* Further, all University of Chicago housing is not on campus. As shown on the attached map from the University of Chicago website, several university-provided housing sites are located within the adjacent residential neighborhoods and surrounded by private residences. *See Exhibit E.*

Furthermore, the University of Chicago does not employ a traditional residence hall system like Georgetown University, but rather a materially different “House System.” Under the House System, each House is staffed by older undergraduates and graduate students and has its own identity, traditions and elected student council. Students who choose to live on campus at

the University of Chicago choose the “House System” experience, a fundamentally different model and not a standard for comparison.

The comparison to Bucknell is also inapposite. Lewisburg, PA and Washington, DC are significantly different. In contrast to Bucknell, located in a small town in central Pennsylvania, Georgetown is located in a vibrant, urban neighborhood. Even if the comparison to Bucknell were valid, Bucknell houses 90%, not 100%, of its undergraduate students, based on the information provided by OP.

Moreover, the comparison to Bucknell’s off-campus program actually highlights that Georgetown does more. Bucknell’s off-campus program describes a progressive system of sanctions that is similar to Georgetown’s system. But Georgetown’s system, which also includes monetary fines, academic probation and suspension, includes far more aggressive sanctions.

Even when set against the distinguishable and selective examples chosen by OP, Georgetown remains competitive in on-campus student housing. Of the seven examples cited by OP in its two reports, no university required students to live on campus for all four years. As shown below, of the universities cited by OP other than Bucknell, which is not comparable, under the 2010 Plan the University will provide as many or more beds than most.

<u>University</u>	<u>Percentage of Students Housed</u>
Harvard University	“most”
Princeton University	“nearly all”
Duke University	85%
Georgetown University	80%
Brown University	79%
Massachusetts Institute of Technology	70%
University of Chicago	55%

Source: Data collected and previously provided by Georgetown University and OP Report, Dec. 22, 2011.

But most relevantly and as recognized by OP, Georgetown will continue to house more students than virtually all other universities in the District of Columbia.

IV. THE MPD DATA SUPPORTS THE EFFECTIVENESS OF THE UNIVERSITY'S PROGRAMS

As demonstrated by the table provided by OP on page 6 of its Supplemental Report regarding 911 disorderly conduct calls, the number of 911 complaints regarding students have been low and are trending downward, particularly as new efforts such as the increased SNAP patrol and reimbursable detail took effect, evidencing the efficacy of these programs.

The data provided by OP in this table also provides an example of the effectiveness of the University's response to complaints. One address listed on the table showed an unusually high number of calls at the beginning of the Fall 2010 semester. Shortly after the University received reports of complaints, the complaints were investigated. Even though some claims were unsubstantiated by MPD or SNAP, the student residents at that address were ultimately called in for a disciplinary meeting, as are all students following a report of misconduct. After that meeting—and as corroborated by the table—no further complaints were received for the balance of the semester (and, indeed, for the balance of the academic year).

Finally, the table also puts the number of disorderly conduct calls on a “student” block in a very important context. When compared to the active commercial areas along M Street and Wisconsin Avenue, the blocks where students live have a mere fraction of the number of 911 disorderly conduct calls. The high number of calls in the commercial areas also evidences that not all of the calls in the residential neighborhood necessarily originates from students and other residents; some likely consist of “spillover” activity from the commercial area that is unrelated to Georgetown University or its students.

V. OVER THE PAST TWENTY YEARS THE UNIVERSITY HAS ADDED SIGNIFICANTLY MORE BEDS THAN THE OP REPORT STATES

In its Supplemental Report, OP notes that the Southwest Quad project provided 780 additional beds, not the 750 noted in OP's earlier report. OP incorrectly excluded the additional beds provided through the renovation of LXR as new housing provided by the University over the last twenty years.

Through the renovation of three existing buildings, the LXR renovation project added a net gain of 190 beds (289 total beds) to the University's housing supply. The LXR project was specifically identified in Appendix H of the 1990 Campus Plan as a housing opportunity site and in its 1992 decision approving the further processing application the BZA noted:

By adding 190 new beds to the University's existing supply of on-campus housing, the project helps fulfill the goals of Appendix H in significant respects. In its order approving the campus plan, the Board identified the project as a ‘priority project’.

Consistent with the commitments contained in Appendix H, the project is targeted for completion within an expedited time frame in order to provide the beds as soon as possible. The targeted move-in date for the undergraduates is the summer of 1994, which is in advance of the 1995 date committed to in Appendix H.

BZA Order No. 15701, Findings of Fact 9 and 19 (attached as Exhibit F).

Accordingly, the LXR project should be included without question in the list of new housing facilities constructed on campus over the last twenty years. As President DeGioia testified, the number of beds provided on campus during that time period is 1,083 net new beds², a significant commitment to housing.

VI. ADDITIONAL INFORMATION ON THE DEFINITION OF “TEMPORARY EMPLOYEES”

As requested by OP in the Initial Report, the University hereby provides additional information on the “temporary employees” definition. “Temporary employees” are defined as employees whose employment is temporary, such as those working on a special project or filling in for someone on extended leave. They are not offered parking on campus because of lack of space. If temporary employees choose to drive, they must park in satellite parking at Rosslyn or on Wisconsin Avenue and then take GUTS to campus.

Employees of contractors or other non-university owned or controlled entities are, by definition, not under the control or management of GU, and thus their numbers cannot be tracked or reported with specificity. A limited number of spaces on campus (20 total) are made available to the management of non-university controlled entities located on campus (e.g., Aramark, Follett and Capital One). All other employees must come to campus by some other means.

Finally, note that contractors are not permitted to park on campus. Through contract provisions, contractors are prohibited from parking on surrounding streets. They must secure satellite parking and provide transportation through either their own shuttle service or a connection to a GUTS route.

² In addition to the 780 new beds in the Southwest Quad and the 190 net new beds in LXR, the University also added beds through the renovation of other on-campus housing and through the conversion of former graduate student housing to undergraduate housing, as was required by the BZA as a condition of the 1990 Campus Plan.

VII. THE UNIVERSITY'S PROPOSED CAMPUS PLAN BALANCES THE INTERESTS OF ALL STAKEHOLDERS AND FULLY ADVANCES COMPREHENSIVE PLAN POLICIES

A. OP Failed to Apply the Established Legal Standard.

1. OP Did Not Consider the Benefits Provided By the University Or the Legal Interests of the University As OP Was Obligated to Do to Determine Whether a "Reasonable Accommodation" Has Been Made.

The Zoning Commission is required to decide campus plan cases in a manner that accounts for the interests and rights of *both* the University and the neighbors, and which protects the University's legal interests:

The University has rights and the neighbors have rights, and a temperate, rational, and balanced approach is called for. The BZA's responsibility is to 'determine whether a reasonable accommodation has been made between the University and the neighbors which does not interfere with the legitimate interests of the latter,' (or we are constrained to add, with the legally protected interests of the former).

President and Directors of Georgetown Coll. v. District of Columbia Bd. of Zoning Adjustment, 837 A.2d 58 (D.C. 2003) (quoting *Glenbrook Road Ass'n v. District of Columbia Bd. of Zoning Adjustment*, 605 A.2d 22, 32 (D.C. 1992)). In so doing, the Zoning Commission must have due regard for the University's needs and prerogatives. See *Spring Valley Wesley Heights Citizens Ass'n v. District of Columbia Zoning Commission*, 856 A.2d 1174 (D.C. 2009).

In OP's own words, OP did not analyze the University's application under this balancing standard. At the public hearing, OP conceded that, in developing recommendations and proposed conditions regarding the 2010 Plan, OP did not believe that it was permitted to consider the University's positive impacts or legal rights. Instead, OP reviewed the application pursuant to a "very clear structure" in the regulations that "the University should have no objectionable conditions that result on the neighborhood, either due to traffic, students, noise, or other objectionable conditions." Tr. May 12, 2011 at 92-93. OP explicitly stated that "we didn't have the ability to weigh the benefits and the outstanding external effects that the University brings to this. And we kept that very seriously in mind." Tr. May 12, 2011 at 92-93. OP's current claim that it applied the proper test is belied by OP's specific testimony on this point. Furthermore, the record contains no evidence that OP conducted the careful balancing required in campus plan cases.

2. Section 210 Does Not Require The University to Eliminate All Objectionable Impacts.

Contrary to OP's apparent belief, the University is not required to demonstrate the proposed 2010 Plan will eliminate all objectionable conditions in the area. *See Citizens Ass'n of Georgetown v. District of Columbia Bd. of Zoning Adjustment*, 403 A.2d 737, 742 n.7 (D.C. 1979) (The "recognition [that existing traffic conditions cannot be attributed solely to the University] exposes the unreasonableness of a request that approval of the plan be conditioned on a showing that the University alleviate the objectionable traffic conditions in the area."). OP and other opponents acknowledged at the hearing, as they must, that the noise and other disruption that neighbors experience is not all due to the University's students; indeed, the transient noise, calls to 911 for disorderly conduct, and limited parking supply all attributed by OP to students could easily also be attributed to other individuals and general proximity to shopping, restaurants, bars and other destinations in the commercial areas of Georgetown.

B. OP Erred In Concluding that the 2010 Campus Plan Is Inconsistent With The Comprehensive Plan.

Section 210 of the Zoning Regulations requires consideration of the relevant policies of the District of Columbia Comprehensive Plan. OP's evaluation of the University's 2010 Campus Plan misapplied selected provisions of the Comprehensive Plan, including the Land Use Maps, and failed to consider multiple other relevant policies and goals of the Comprehensive Plan that will be furthered by the 2010 Plan. Taken as a whole, the proposed 2010 Plan is consistent with the District's Comprehensive Plan. In particular, the campus plan provides an opportunity for new jobs and educational opportunities, continued commitment to transportation demand management measures, and the establishment of a satellite campus for the School of Continuing Studies, all of which are specifically endorsed by the Comprehensive Plan.

1. OP Erred in the Application and Interpretation of the Land Use Maps.

OP misapplied the Land Use Maps that guide policy decisions which, when taken together as a whole, clearly call for the continued diversity of moderate density land use in the surrounding residential neighborhoods. Although the Generalized Policy Map (not the Future Land Use Map, as OP indicates) identifies the neighborhoods around the University as "neighborhood conservation areas," Georgetown, Burleith and Foxhall are far from unique in this respect as the Policy Map designates virtually all residential neighborhoods within the District of Columbia as "neighborhood conservation areas." Moreover, the Comprehensive Plan explicitly states that within such neighborhood conservation areas, "[t]he diversity of land uses and building types should be maintained." 10A DCMR § 223.5 (2006).

Furthermore, the Future Land Use Map identifies the surrounding Georgetown, Burleith and Foxhall Village neighborhoods as Moderate Density Residential, not low-density residential

as has been suggested by the parties in opposition.³ The Comprehensive Plan describes such neighborhoods as a mix of single-family houses, rowhouses, 2-4 unit buildings, and low-rise apartments as well as, in older inner city neighborhoods, existing apartment buildings. 10A DCMR § 225.4 (2006). The Comprehensive Plan also explicitly calls for change and infill on land designated as Institutional, such as Georgetown University. 10A DCMR § 223.22 (2006).

Nothing in the Comprehensive Plan's land use designations of either Georgetown University or the surrounding communities counsels for the complete elimination of undergraduate students and related "group houses" from the surrounding moderate-density residential neighborhoods. To the contrary, the Maps explicitly call for the preservation of the diverse mix of land use and housing types that include University students who live off campus.

2. As Applied to the 2010 Plan, the Policies Identified by OP Clearly Do Not Support OP's Proposed Enrollment Rollbacks and Undergraduate Housing Requirements.

OP also cites to a handful of Comprehensive Plan policies to support the agency's recommended enrollment rollbacks and housing requirements. But a straightforward and balanced reading of the policies cited by OP clearly demonstrates that the 2010 Plan, as amended, is consistent with these provisions and indeed furthers their important goals.

Policy LU-2.3.5: Institutional Uses & Policy LU-3.2.3: Non-Profits, Private Schools, and Service Organizations

Recognize the importance of institutional uses, such as private schools, child care facilities, and similar uses, to the economy, character, history, and future of the District of Columbia. Ensure that when such uses are permitted in residential neighborhoods, they are designed and operated in a manner that is sensitive to neighborhood issues and that maintains quality of life. Encourage institutions and neighborhoods to work proactively to address issues such as traffic and parking, hours of operation, outside use of facilities, and facility expansion.

Ensure that large non-profits, service organizations, private schools, seminaries, colleges and universities, and other institutional uses that occupy large sites within residential areas are planned, designed, and managed in a way that minimizes objectionable impacts on adjacent communities. The zoning regulations should ensure that the expansion of

³ GW's Foggy Bottom Campus, Howard University's Main Campus, Trinity University, Gallaudet University and The Catholic University of America are all adjacent to similar moderate-density neighborhoods located in the R-3 and R-4 zone districts.

these uses is not permitted if the quality of life in adjacent residential areas is significantly adversely affected.

Campus Plan: Through the 2010 Plan, the University will continue to make significant investments in and contributions to the District of Columbia. The University has agreed to a series of significant and comprehensive measures that will proactively address all of the issues identified in these Land Use Policies, ranging from increased police patrols and daily trash service to transportation infrastructure improvements on and off campus and a new satellite location for the School of Continuing Studies. All of these measures will notably improve the quality of life in the surrounding neighborhoods and benefit the District as a whole.

Policy EDU-3.3.2: Balancing University Growth and Neighborhood Needs

Encourage the growth and development of local colleges and universities in a manner that recognizes the role these institutions play in contributing to the District's character, culture, economy, and is also consistent with and supports community improvement and neighborhood conservation objectives. Discourage university actions that would adversely affect the character or quality of life in surrounding residential area.

GU Campus Plan: The 2010 Plan calls for modest growth by the District's largest private employer and allows Georgetown to continue to contribute the city's intellectual and cultural fabric. To respond to concerns about actions that could adversely affect the surrounding residential neighborhoods, the University has consistently and repeatedly made significant changes and modifications to the 2010 Plan.

Policy EDU-3.3.4: Student Housing & Policy NNW-1.1.8: Student Housing

Encourage the provision of on-campus student housing in order to reduce college and university impacts on the housing stock in adjacent neighborhoods. Consider measures to address the demand for student housing generated by non-District institutions within local branches.

Support and promote efforts by the area's universities to develop on campus dormitories in order to reduce pressure on housing in nearby neighborhoods.

GU Campus Plan: Building on a significant increase in on-campus housing over the last twenty years that added nearly two beds for each new undergraduate student during the period, the University now commits to another 250 additional undergraduate beds by Fall 2014 with no corresponding increase in the number of undergraduate students. Through the construction of over 1,300 beds in a twenty-five year span, Georgetown University continues to lead other major District universities in addressing the goals of the Comprehensive Plan regarding student housing.

Policy EDU-3.3.5: Transportation Impacts of Colleges and Universities

Support ongoing efforts by colleges and universities to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, shuttle service, bicycling, and other transportation demand management measures. The provision of adequate on-site parking for institutional uses also should be encouraged.

GU Campus Plan: The University's Transportation Demand Management program has been lauded by DDOT as one of the most comprehensive and effective in the District of Columbia and the 2010 Plan includes additional enhancements to even further reduce potential impacts. The 2010 Plan and related TDM will also address parking concerns through, among other measures, a continued commitment to satellite parking and the creation of a new transit-oriented satellite location for the University's School of Continuing Studies. The 2010 Plan also includes significant physical infrastructure improvements both on-campus to address concerns about the impact of University buses and off-campus along Reservoir Road to improve traffic operations.

3. OP Ignored Multiple Other Relevant Comprehensive Plan Policies and Goals that are Furthered By and Consistent with the 2010 Campus Plan.

Although the 2010 Plan is clearly consistent with the Comprehensive Plan goals and policies identified by OP, the 2010 Plan also carries out the guiding policies of the Comprehensive Plan as well as many other policies contained in the Land Use, Transportation, Environment, and Education Elements, none of which were addressed by OP.

Framework Element: The 2010 Plan will further many of the guiding principles of the Comprehensive Plan. Most notably, the 2010 Plan will further the important growth of colleges and universities, which contribute to the "knowledge based economy, improve access to learning, and broaden economic prosperity for all District residents." 10A DCMR § 219.5 (2006). The 2010 Plan also furthers other key guiding principles related to continued growth in jobs and residents (§ 217.7), strengthened institutional uses that reinforce neighborhood identity and provide services for residents (§ 218.2), increased access to jobs and transportation (§ 219.1), increased investment in transportation alternatives and infrastructure (§§ 220.1, 220.2), and serving as a role model for environmental sustainability and stewardship (§ 221.3).

Land Use Element: In addition to furthering the goals of Policies LU-2.3.5 and 3.2.3 as described above, the 2010 Plan continues the University's leadership as a role model and corporate citizen in efforts to improve the city's physical environment in support of Policy LU-3.2.2 (and the identical EDU-3.2.2). The 2010 Plan includes commitments to all of the elements of this policy, including continued commitment to high quality architecture and design, expanded use of "green building" methods and low impact development, and the adaptive reuse and preservation of historic buildings.

Transportation Element: In addition to advancing the specific transportation policies related to universities in Policy EDU-3.3.5 and parallel goals in the Transportation Element, the 2010 Plan also advances specific actions of the Comprehensive Plan; the 2010 Plan provides a comprehensive Transportation Demand Management Plan (Action T-1.1.B); invests in improved bus stops and routes (Actions T-2.1.D and T-2.2.E) and bicycle, carpool, carsharing and bikesharing facilities (Actions T-2.2.C and T-2.3.A); promotes an improved on-campus pedestrian sidewalk network (Action T-2.4.B); and funds traffic signal and intersection improvements (Action T-2.5.A).

Environmental Element: The 2010 Plan will advance many goals and policies of this Element, including continued commitment to campus landscaping, green roofs, and other amenities that are aesthetically pleasing and reduce stormwater runoff (Policy E-1.1.3); energy efficiency and reduction in consumption through building features that include solar arrays and thermal storage tanks and an overall commitment to reduce the University's carbon footprint (E-2.2.2); alternative energy sources (E-2.2.4); reduction of solid waste, through a comprehensive effort to compose and reuse or dining hall waste (E-2.3.1); and support green building techniques (E-3.2.1).

Education Element: As set forth above, the 2010 Plan will further the goals of Policies EDU-3.3.2, 3.3.4, and 3.3.5 and also advances Policy EDU-3.3.3 through a campus plan prepared after a multi-year community and city agency outreach process with many accommodations and other measures that ensure the University is not likely to become objectionable to the surrounding neighborhoods. The University and its students, faculty and staff also participate in a number of substantial partnerships with D.C. schools and related outreach efforts that significantly improve pathways to learning (all described in Tab O of the December 30, 2010 Campus Plan filing) in fulfillment of Policy EDU-3.2.1. Finally, the 2010 Plan's commitment to a satellite location for the School of Continuing Studies is fully consistent with Policy EDU-3.3.1.

In summary, there is no question that the recommendation of OP for a 100% housing requirement or a rollback in enrollment would undercut rather than promote the policies of the Comprehensive Plan. Nor are such measures required; the 2010 Plan carries out the goals and policies of the Comprehensive Plan in many significant respects.