Georgetown Residents Alliance

3070 2 Street, N.W., Washington, D.C. 20007

April 5, 2000

Jerrily R. Kress
Executive Director
Board of Zoning Adjustment
441 4th Street, N.W.
Washington, D.C. 20001

'00 APR -5 P4:52

RE: REQUEST FOR "PARTY" STATUS IN BZA No. 16565
Georgetown University's Application for Special Exception to convert St Mary's Hall from Undergraduate Housing into Office Space.

Dear Ms. Kress:

Pursuant to the Board's procedural rules, this is to request that the Georgetown Residents Alliance (GRA) be granted status as an "opposing party" in the above referenced special exception proceeding. The GRA is a civic association with more that 250 members who reside in Georgetown. Its primary objective is to represent the collective interest of its members in preserving the character of Historic Georgetown as a pleasant and safe place to live. GRA represents numerous members who reside in close proximity to the Georgetown University and St. Mary's Hall and who will be affected by the BZA's decision. The GRA has been a party in two previous cases before the BZA (No. 16246 and 164770). Because the requested exception is for an amendment to the GU campus plan, numerous economic, environmental, and social impacts are involved

GRA believes it is essential that the University's witnesses be cross-examined by representatives of the surrounding community to elicit the actual facts concerning the number of dormitory beds on campus and the crucial future need for more beds on campus. GRA will be represented by the undersigned member of the District of Columbia Bar who will conduct the cross-examination.

The GRA maintains that the University's proposal to convert St Mary's Hall from its current approved use as an undergraduate dormitory into an office building constitutes an egregious breach of the University's commitment to residential community, in its current Campus Plan, to build 925 new undergraduate beds on campus by 1997. The renovation and expansion of St. Mary's Hall from 215 beds to 415 beds was one of the three construction

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projects that comprised the University's 925 "new bed" commitment.[1] The University, however, completed only one of those construction projects to create 193 new beds at LXR. It then canceled that gain out entirely in 1997, (the year by which all 925 new beds were to be in use) by closing the existing 215 beds at St. Mary's. Thus, the ten year period of the Campus Plan has now passed and the University has established only 54 new undergraduate beds on campus.[2] As a result, the problems with noisy student houses in the surrounding residential neighborhoods have been exacerbated rather than solved – as the University promised **and the Campus Plan requires.**

Because this Board specifically incorporated the University's commitment to build 925 new on-campus undergraduate beds as a condition of the Campus Plan, P. 10 ¶ 22a, the University's proposal to decommission 215 existing dormitory beds also constitutes a blatant violation of that order. Accordingly, the GRA respectfully asks this Board to require the University to comply immediately with the requirement to construct 925 new beds. Because the only remaining location for the promised additional on-campus housing is St. Mary's Hall, the University's attempt to convert it to office use must be rejected. The University can meet its long-standing commitment to the surrounding neighborhood to eventually house all of its undergraduate students and most of its graduate students on campus **only by constructing the 415 beds at St. Mary's Hall as this Board's Order requires.**

Accordingly, the GRA respectfully requests this Board to grant it status as a party in the above referenced proceeding and to schedule **ample time at the hearing to permit GRA's attorney to cross-examine the University's witnesses.**

Sincerely,

Don W. Crockett

Don W. Crockett
Chairman
D.C. Bar No. 953489
3070 Q Street, N.W.
Washington, D.C. 20007

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[1]The other two components were the renovation and expansion of Loyola-Xavier-Ryder (LXR) to create 225 new beds and the construction of a new 500 room dormitory. Campus Plan Order page 10 ¶ 22a. See also p. 36, ¶ 5, which incorporates Exhibit H Section IVA, pp 11-12.

[2]The University ultimately "promised" to build a 780 bed undergraduate facility as part of its Southwest Quadrangle project. If that project eventuates as promised, the University will still be 91 beds short of its 925 new bed requirement in the current campus plan – not to speak of its commitment to bring 100% of undergraduates on campus.