Georgetown Residents Alliance
3070 2 Street, N.W., Washington, D.C. 20007

May 16, 2000

Rec'd.
MAY 16 2000

BZA No. 16565

**STATEMENT OF THE GEORGETOWN RESIDENTS ALLIANCE IN OPPOSITION TO THE UNIVERSITY'S PROPOSAL TO CONVERT ST. MARY'S HALL FROM DORMITORY TO OFFICE USE**

The GRA opposes the University's application for an exception on three fundamental grounds:

**1. The use of St. Mary's is an integral part of the new campus plan.** The use of St Mary's Hall should not be considered separately in this proceeding, but only as an integral part of the University's new ten-year campus plan which is currently scheduled for hearings on May 16, and June 18, 2000. Because the use to which St Mary's Hall is put will affect the uses and activities at all other campus locations, it should not be singled out for separate treatment. Instead, the Board should consider St. Mary's Hall together with all other aspects of the new 10-year campus plan.

**2. The University cannot meet its commitment to house 100% of its undergraduate students on campus without St. Mary's Hall.** the University's proposal to convert St. Mary's from a dormitory into an office building is a breach of its long term commitment "to provide housing for 100 percent of its undergraduate students on campus." BZA Order in No 15302 , ¶ 24 a. In the Bicentennial Campus Plan, the University committed to reconstruct "St. Mary's to provide 200 new beds" by 1997. BZA Order ¶ 22 a, iii. Instead of meeting that commitment, the University closed the existing 217 beds in 1996 and forced that number of students back into the community.

If the 417 undergraduate beds at St. Mary's Hall (which under the Bicentennial Campus Plan were to be completed and occupied by 1997) are now converted to office space, the University will have made it impossible to meet its own solemn commitment to "provide housing for 100 percent of its undergraduate students on campus." There simply may be no other location on campus where the University can meet its commitment to house 100% of its undergraduates on campus.

Indeed, in its new campus plan, the University proposes to add an additional 500 undergraduate students without adding a single new bed which would actually further reduce the number of students living on campus to 86%, even after the 750 bed Southwest Quadrangle

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is constructed.. This Board should not tolerate such breaches of contract by the University, much less reward them by granting the University's request to permanently take the proposed 417 beds out of service forever.

**3. The University's failure to have a 417 bed facility at St Mary's Hall by 1997, constitutes an egregious breach of the University's specific commitment in the Bicentennial Campus Plan.** As the figures provided separately to the Board by ANC Commissioner, Barbara Zartman, demonstrate, by 1997 when all 925 of the promised new undergraduate beds were to be in use, the University actually had a deficit of more than 100 beds. The primary reason for this dismal performance is that instead of constructing 200 new beds at St. Mary's Hall, the University closed the existing 217 beds in that dormitory. That was a slap in the face to the residential community who had bargained in good faith for the University's commitment to build those beds in the Bicentennial plan.

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 217 existing dormitory beds also constitutes a blatant violation of that order. As the evidence demonstrates, when undergraduates are not housed on campus, they rent houses in the community and cause terrible problems for the neighbors with noise and trash. Therefore, the proposed conversion of St. Mary's Hall would cause serious adverse affects on the surrounding community by forcing 417 undergraduates to continue to live in private student rentals in Georgetown, Burlieth, Foxhall, and Glover Park.

Accordingly, the GRA respectfully asks this Board to require the University to address its proposed use of St Mary's Hall as an integral part of its new campus plan or, in the alternative, to deny the application on the ground that the proposed conversion constitutes a breach of the University's commitment to the residential community as well as a violation of the Board's Order in the Bicentennial Campus Plan and would "become objectionable to neighboring property because of noise, traffic, number of students or other objectionable conditions."

Respectfully submitted,

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