ShawPittman LLP

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December 27, 2001

By Hand Delivery

Jerrily Kress
Office of Zoning, Director
441 4th Street, NW
Second Floor
Washington, DC 20001

Re: BZA Application No. 16566 - Georgetown University Campus Plan Application – Response to Citizens Association of Georgetown Letter Dated December 14, 2001

Dear Ms. Kress:

This letter responds to the issues raised in the December 14, 2001 letter filed by the Citizens Association of Georgetown ("CAG") in the record of this case. On behalf of Georgetown University (the "University"), we request that the Board of Zoning Adjustment ("BZA" or "Board") determine that the November 14, 2001 revised Campus Plan submitted by the University is entirely consistent with BZA Order Nos. 16566 and 16566A. We also request that the Board certify the November 14, 2001 Campus Plan as the approved Campus Plan so that copies of the approved Plan may be forwarded to the Office of Zoning and the Zoning Administrator.

In its letter dated December 14, 2001, CAG claims that proposed revised campus plan fails to reflect the Board's Orders, and is thus inconsistent with the Orders. CAG is seeking to have the final Campus Plan include materials and documentation that are not typically included in other Campus Plans and are for the most part already included in the record of this case. In essence, CAG wants the Campus Plan to replicate the voluminous record of this case. That is not what is required.

CAG's statement that the Campus Plan submitted by the University on November 14, 2001 does not reflect the BZA's Orders in this case is not correct. The November 14, 2001 Campus Plan is entirely consistent with the Board's Orders and follows the established practice and precedent followed by all other universities in their campus plan approval process, as well as previous Georgetown University Campus Plan approvals. The fact that CAG has developed a new idea as to what the Campus Plan should look like does not make the University's November 14, 2001 Campus Plan not responsive to BZA

BZA
Case No. 16566A
Exhibit No. 260

Board of Zoning Adjustment
District of Columbia
CASE NO.16566
EXHIBIT NO.260

Order Nos. 16566 and 16566A. Further, Georgetown University has and will continue to abide by all of the conditions of the Board's approval of its Campus Plan.

We look forward to the Board addressing this issue at its January 2, 2002 public meeting and we ask that the Board certify the November 14, 2001 Campus Plan as the approved Campus Plan so that the University can proceed with the development goals outlined in the Plan. Thank you for your attention to this matter.

Sincerely,

Maureen Dwyer

Paul Tummonds

cc: See Attached Certificate of Service

Document #: 1198397 v.1

ShawPittman LLP

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the attached document were hand-delivered this 27th day of December 2001, to the following parties:

Advisory Neighborhood Commission (ANC) 2E
c/o Jellef Boys Club
3265 S Street, N.W.
Washington, D.C. 20007

Hillandale Homeowners Association
Scott Anderson, General Manager
Charles R. Braun, Esq.
3939 Hillandale Court, N.W.
Washington, D.C. 20007

Georgetown Residents Alliance
Don W. Crockett, Esq., Chairman
3070 Q Street, N.W.
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Burleith Citizens Association
Patricia Scolaro, President
1807 37th Street, N.W.
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Foxhall Community Citizens Association
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Cloisters in Georgetown Homeowner's Association, Inc.
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Paul A. Tummonds, Jr.