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August 3, 2005

2005 AUG -3 AM 9:00
D.C. BOARD OF ZONING ADJUSTMENT

Geoffrey Griffis, Chairman
Board of Zoning Adjustment
One Judiciary Square
441 4th Street, NW
Washington, DC 20001

Re: BZA Order No. 16566-F – President and Directors of Georgetown College ("Georgetown")

Dear Mr. Griffis:

The Citizens Association of Georgetown ("CAG") respectfully submits the following comments on the revised campus plan (the "Campus Plan") submitted by Georgetown on July 20, 2005 pursuant to Board of Zoning Adjustment's Order No. 16566-F, dated June 7, 2005 (the "Order").

The Order required Georgetown to prepare a revised campus plan that included several elements including "its Code of Student Conduct; Guide to Off-Campus Living, description of its New Office of Campus Student Affairs Program, and any other documents reflecting the programs, policies and procedures it has or will institute, and to which it is required to implement and enforce, pursuant to condition No. 3 of this Order, including those described in Findings of Fact No. 35-37 and set forth in Exhibit No. 191 of the record." (Order, Condition 7)

While Georgetown included a copy of its current Code of Student Conduct, Guide to Off-Campus Living and a brief description of its Office of Off-Campus Student Life, it failed to include in that description the elements of its New Office of Campus Student Affairs Program (OSCAP) as described in Finding of Fact No. 37 and record Exhibit No. 191, as required by the Order.

BZA
Case No. 16566-F
Exhibit No. 296

Board of Zoning Adjustment
District of Columbia
CASE NO.16566
EXHIBIT NO.296

OSCAP is an essential part of the Campus Plan designed to reduce the adverse impact on the surrounding community by students living off campus. Although Georgetown has previously submitted documents that briefly describe OSCAP, the BZA was very clear that a detailed description of the program must be included in the revised Campus Plan before it is approved. (*See* Transcript of BZA Public Meeting at 164-168 (April 5, 2005)).

Exhibit No. 191 sets forth the essential elements and goals of OSCAP, including that the program is comprehensive in terms of the negative impacts addressed and the resources committed. Exhibit No. 191 was submitted to the BZA on October 6, 2000. Since then, Georgetown has had nearly 5 years to develop and refine OSCAP. An updated overview of OSCAP should be included in the revised Campus Plan.

Much of the substance of Exhibit No. 191 was also included in Finding of Fact No. 37 of the Order. Each element of OSCAP set forth in Finding of Fact No. 37 is critical to reduce adverse impacts on the Community and should be included in the Campus Plan. Many of these elements were not included Georgetown's revised Campus Plan.

The revised Campus Plan did not contain a specific "acknowledgement that the University will address adverse impacts from students living off campus, including noise, drinking, partying, parking, trash, and disrespectful behavior," as required by subsection (a). It did not contain a "clear statement that the University will not tolerate behavior that adversely impacts the surrounding community and reflects poorly on the institution," as required by subsection (b). Each of these statements should be included in a description of OSCAP.

The revised Campus Plan made no mention of the Alliance for Local Living ("ALL"), a neighborhood council that is critical to facilitate the relationship between the Georgetown, the community and the District. The development of ALL was expressly set forth in subsection (d) and should be included in the revised Campus Plan.

Coordination with the Metropolitan Police Department and increased programming, as described in subsections (e) and (f), respectively, are also elements of OSCAP that should be included in the revised Campus Plan.

Finally, an implementation plan that includes the sharing of statistics, as contemplated by subsection (g), is essential to monitor the progress of OSCAP. Without these statistics it will be difficult for the Zoning Commission, in considering an application for further processing, or the BZA, in considering the 2010 Campus Plan, to determine if OSCAP has been successful in reducing adverse impacts on the community.

CAG is not requesting that Georgetown implement any new program. OSCAP has been in existence for several years. However, the program is in need of substantial strengthening if it is to be successful in reducing the adverse impacts of the increasing number of students living off campus on the neighboring community. Accordingly the BZA should require Georgetown to comply with its Order and submit a comprehensive description of OSCAP as part of its Campus Plan.

Sincerely,

Richard Hinds/DN

Richard deC. Hinds

CERTIFICATE OF SERVICE

I certify that copies of the foregoing *Petition for Review* was mailed, postage prepaid, on July 5, 2005 to the following:

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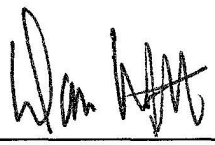
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