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May 2, 2000

BY HAND

Ms. Sheila Cross Reid
Chairperson
Board of Zoning Adjustment
441 Fourth Street, N.W., Room 201
Washington, D.C. 20001

DISTRICT OF COLUMBIA
00 MAY -2 PM 1:11

Re: BZA Application No. 16566

Dear Ms. Reid and members of the Board of Zoning Adjustment:

I have enclosed for your consideration the request of the Hillandale Homeowners Association to appear as a party in the above-referenced matter.

I appreciate your consideration.

Sincerely,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

Richard B. Nettler

enclosure
cc: Scott Anderson

BZA
Case No. 16566
Exhibit No. 32

Board of Zoning Adjustment
District of Columbia
CASE NO.16566
EXHIBIT NO.32

BEFORE THE BOARD OF ZONING ADJUSTMENT
OF THE DISTRICT OF COLUMBIA

BZA Application No. 16566 **Application of Georgetown University**

HILLANDALE HOMEOWNERS ASSOCIATION'S REQUEST TO APPEAR AND PARTICIPATE AS A PARTY

The Hillandale Homeowners Association ("HHA"), by and though its counsel, Richard B. Nettler and Robins, Kaplan, Miller & Ciresi L.L.P., requests to appear and participate as a party with regard to the application of the Georgetown University for review of a new campus plan for 2000-2010. In accordance with 11 D.C.M.R. § 3106.2, HHA submits the following information in order for the Board of Zoning Adjustment to assess this request.

1. The HHA is located at 3939 Hillandale Court N.W., Washington, D.C. 20007. It represents individual property owners within the Hillandale community. Those individuals own property which is separated from the northern portion of the Georgetown University campus by Reservoir Road, N.W., and are therefore within two hundred feet of the campus. As such, the HHA and its members use and occupancy of their property will be directly affected by aspects of the proposed campus plan which affects traffic and parking in the immediate area and the value of the members property. The proposed campus plan includes almost 500,000 square feet of proposed construction on the north campus which is apparently slated for use by Medstar as indicated in the April 3, 2000 certificate of need ("CON") application filed on Medstar's behalf. That proposed use, which is more fully spelled out in the CON application, then in the proposed campus plan, also involves Medstar's use of existing buildings. The traffic implications of the use has not been adequately assessed. In addition, although discussed in the CON application, the proposed campus plan also fails to address the impact of the helipad proposed for the north campus, which impact could

be significant and adverse to the immediately adjacent property owners such as those who comprise the HHA. Aside from the impact on property values, a helipad use will also have adverse noise and visual impacts on the property owners represented by HHA

2. HHA will appear as an opponent until such time as an agreement with the applicant can be reached. If such an agreement can be reached, HHA will notify the Board of Zoning Adjustment immediately. If no agreement can be reached which will assure HHA that the application complies with the requirements for approval of a special exception, this statement will be supplemented.

3. HHA will appear through its counsel, Richard B. Nettler and the law firm of Robins, Kaplan, Miller & Ciresi L.L.P., 1801 K Street, N.W., Suite 1200, Washington, D.C. 20006. A letter to the Board of Zoning Adjustment confirming this designation is attached hereto.

4. The proposed application is also inconsistent with the Land Use Elements of the Comprehensive Plan and the intent and purposes of the campus plan regulations and requirements.

As will be more fully developed at the hearing in this case, the proposed campus plan will have an adverse effect on HHA and its members.

Respectfully submitted,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

Richard B. Nettler

1810 K Street, N.W.
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Washington, D.C. 20006
202-775-0725

Counsel to the Hillandale Homeowners Association.

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TO: **Robins, Kaplan, Miller & Ciresi, LLP**

ATTN: **Richard Nettler, Esq.**

FROM: Scott Anderson
General Manager

DATE: **May 1, 2000**

RE: **BZA Application 16566**
Georgetown University Campus Plan Application

Dear Mr. Nettler;

Please consider this a formal request that you represent our Association in the above-referenced matter, particularly in the immediate filing of a motion that Hillandale Homeowners Association be named an interested party in this matter.

If there are any questions regarding this matter, please have the appropriate party contact me at their convenience.

Thank you for your prompt attention.