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Not Engaged in the Practice of Law.

January 13, 2003

Ms. Carol Mitten, Chair
Zoning Commission for the
District of Columbia
441 4th Street, N.W.
Suite 210
Washington, D.C. 20001

D.C. RECEIVED
OFFICE OF ZONING
2003 JAN 13 PM 4:23

Re: Zoning Commission Case No. 02-32
Georgetown University Performing Arts Center
Response to Letter from Citizens Association of Georgetown

Dear Ms. Mitten and Members of the Commission:

Georgetown University submits this letter in response to the letter dated January 2, 2003, filed by the Citizens Association of Georgetown ("CAG"). Attached to the January 2nd letter is a second letter from CAG dated November 25, 2002, which the University had no knowledge of prior to receiving the January 2nd letter and which apparently was not submitted to the Zoning Commission prior to January 2. Neither letter was sent to the University by CAG. The University offers this letter as a pre-hearing, summary response to the issues raised in CAG's November 25th letter.

CAG requests postponement of the case claiming that the University has not complied with the recently adopted Board of Zoning Adjustment Order approving the University's campus plan (Order No. 16566-C). The University sees no basis for a postponement, and would strongly object to a further delay of the hearing. The University's Pre-Hearing Submission dated November 21, 2002 included a detailed statement showing that the University fully complies with the conditions set forth in the campus plan Order. In this statement (a copy of which is attached for the Commission's convenience), the University has exhaustively set forth its compliance with each of the conditions in the Order. Appropriate University representatives will be present at the hearing to address any questions that the Commission may have.

Zoning Commission
District of Columbia
Case 02-32
Exhibit 35

ZONING COMMISSION
District of Columbia
CASE NO.02-32
EXHIBIT NO.35

CAG claims that the University has violated the enrollment cap. The University disagrees. As set forth in the University's response to Condition No. 2 (see pages 1 and 2 of the attached compliance statement), the University is in full compliance with the enrollment cap. While the spring enrollment numbers for 2003 are not yet available, the University fully expects that the enrollment number for the 2002/2003 academic year will be well below the cap. As explained in the compliance statement, the University averages the fall and spring numbers to arrive at its enrollment number for the academic year, which is a practice it has been using for over 12 years. The University's enrollment numbers for traditional full-time undergraduates historically are higher in the fall than in the spring due primarily to students leaving campus in the spring to attend Georgetown programs in other countries.

Second, CAG claims that the University has refused to monitor the registration of student vehicles. The University describes in great detail how it complies with Condition No. 14 of the Order (see pages 7 and 8 of the attached statement). University representatives will be prepared at the public hearing to respond to any questions the Zoning Commission may have about how this process works.

Third, CAG claims that the University is not providing monthly reports about the outcome of individual community complaints about student conduct. The University, as stated in its response to Condition No. 9 (see pages 5 and 6 of the attached statement), has fully complied with the Board's requirement to make public available data regarding off-campus student conduct related issues. The University sends these reports quarterly to the Office of Planning, the Zoning Administrator, ANC 2E and the Alliance for Local Living. The Order does not require the University to submit monthly reports. As to the allegation in one of the letters that disorderly conduct citations of students are at a four-year high, please see the attached letter from Lieutenant Brian S. Bray of the Second District Police Precinct.

Fourth, CAG states that the University has removed a running track that the plan called for retaining on campus. The University's campus plan does not call for the retention of any track on campus, in fact, the campus plan makes no mention of any running track whatsoever. The University has recently been required to remove the old track on the roof of the Yates Field House for structural reasons. The track was leaking water into the interior of Yates, causing substantial water and structural damage. The track could not be made to adhere properly to the roof to prevent water damage to the building and, unfortunately, had to be removed.

Finally, CAG mentions that it never received a response to a letter it wrote to the President of Georgetown University. The University did indeed respond, and a copy of its response is attached for the Commission's information

Thank you for providing the University an opportunity to respond to the issues raised by CAG. The University will be prepared to address any questions that the Commission may have at the hearing on January 16th.

Sincerely,

Cynthia A. Giordano

Nathan W. Gross, AICP

Attachment

cc: Office of Planning
Raymond J. Kukulski, CAG

METROPOLITAN POLICE

Second Police District

3320 Idaho Avenue, Washington D.C., 20016 (202) 282-0042 FAX (202) 282-0196

December 4th, 2002

Office of Planning
District of Columbia

Honorable Members of the Board,

It has been brought to my attention that the members of the Office of Planning may have been misinformed about the current situation involving incidents of disorderly conduct around the Georgetown University. Specifically, I have been advised that the board was informed that incidents of disorderly conduct involving Georgetown University students are at a four (4) year high.

I am writing this letter to assure you that this in not the case. I am the Police Service Area Lieutenant for Police Service Area (P.S.A.) 205. P.S.A. 205 encompasses the Georgetown University, a section of Georgetown, Burleith, Glover Park, Massachusetts Heights, and Cathedral Heights. I have been serving as the P.S.A. Lieutenant in Georgetown for the past two (2) years. In this time, I believe that great strides have been made to reduce disorderly behavior in the west Georgetown and Burleith neighborhoods. Through a cooperative effort involving the police, the community, and the Georgetown University, we created an action plan to address disorderly conduct issues. This action plan was implemented in the year 2001. At the end of the year, a statistical analysis was conducted. This analysis showed that the action plan was a success. Due to the combined efforts of all concerned stakeholders, calls for service involving disorderly conduct (in the Georgetown & Burleith areas) were reduced 15% in the year 2001 as compared with the year 2000.

A further comparison showed that calls for service involving disorderly conduct were 22% lower in the year 2001 as compared with the year 1999. Year to date for 2002, disorderly calls for service are slightly higher (approximately 3%) than last year. However, calls for service are still 12% lower than they were in the year 2000.

I believe that it is the perception of several community members that this year has been a "bad" year for disorderly behavior and student misconduct. I attribute this perception to the fact that my officers have been more vigilant and less tolerant about disorderly behavior than last they were last year. I have directed my officers to adopt a "zero tolerance" approach to quality of life offenses and noise violations. This approach has resulted in a considerable increase in enforcement activities (arrests, criminal citations, fines) in the year 2002. Due to the fact that I report all enforcement actions taken against Georgetown students to the Georgetown University and to several community groups, I believe these groups have taken the increased enforcement numbers to equate to increased student misbehavior. As I have previously stated, I do not believe that this is the case.

I have polled my officers and sergeants about this issue. The consensus is that Georgetown University student behavior has dramatically improved over the past four (4) years. The majority of my officers feel that student behavior has been better this year than it was last year, even with the 3% increase in calls for service in the area. The remainder of my officers indicated that student behavior seems no better or no worse than last year. Almost all of my officers agree that student conduct is much better than it was four (4) or five (5) years ago. Since many of these officers have been dealing with these issues on a continual basis for several years, I will put my trust in their experience and judgment.

In closing, I would like the Board to know that the police, the community, and the Georgetown University have been working hard to reduce incidents of student misconduct in the Georgetown area. I know these efforts have not been futile. I am confident that the mechanisms we have put in place will continue to have a positive impact on this issue. Should you have any questions or concerns, please contact me at (202) 996-6568 (pager) or (202) 282-0032 (office). I appreciate your consideration of this letter.

Sincerely,

Brian S. Bray
Lieutenant
Second District

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555 Twelfth Street, NW
Washington, DC 20004-1206

November 21, 2002

Ms. Carol Mitten
Chairperson, District of Columbia Zoning Commission
Office of Zoning
441 4th Street, N.W.
Suite 210
Washington, D.C. 20001

Re: Georgetown University; ZC Application No. 02-32

Dear Ms. Mitten:

Pursuant to Section 210.8 of the Zoning Regulations, on behalf of Georgetown University, I hereby certify that the construction of the proposed new Performing Arts Center, which is the subject of the above-referenced application, will not cause the floor area ratio (FAR) for the campus as a whole to exceed the 1.41 limit set forth in the recently approved campus plan.

Sincerely,

Cynthia A. Giordano

Georgetown University
Review and Certification of Compliance with Campus Plan Conditions
Board of Zoning Adjustment Order 16566-C
November 21, 2002

Condition No. 1

The Applicant's proposed campus plan is approved until December 31, 2010, subject to the following conditions intended to mitigate any adverse impacts potentially arising from the location of a university use in a residentially zoned district, or until such time prior to December 31, 2010 as the Zoning Commission determines that conditions warrant submission of an updated campus plan or grants a request to amend the plan.

Statement: The Applicant's campus plan was approved by the BZA through December 31, 2010, subject to the conditions listed in the Order. The University has not requested that the plan be amended.

Condition No. 2

The Applicant shall not increase undergraduate enrollment above the cap of 5,627. This cap shall apply to traditional full-time undergraduate students; that is, undergraduate students who require housing.

Statement: The Office of the University Registrar provides the following enrollment information as of November 20, 2002:

Enrollment Report Fall 2002

Source: Official Statistics Fall 2002 September 24, 2002
Official Statistics Fall 2001 September 25, 2001

	Fall 2002	Fall 2001
Total University headcount	12,856	12,688
Undergraduate headcount	6,331	6,422
Undergraduate part-time headcount	215	231
Undergraduate full-time headcount	6,116	6,191
Undergraduate full-time non-degree	145	183
Undergraduate full-time degree	5,971	6,008
Non-traditional headcount	217	261
Traditional Headcount	5,754	5,747****

The Cap applies to an average of the Fall and Spring enrollments. The University expects the usual drop between fall and spring, so that the final average traditional headcount is fully expected to be well under the cap. Last year the University was 129

under the cap, with a count of 5,747 in fall 2001 and a count of 5,248 in spring 2002, for an average of 5,498. The 5,754 enrolled this fall is only 7 students more than in fall 2001, and the University expects a comparable drop in enrollment for the spring term as occurred last academic year.

Report Definitions:

1. Undergraduate full-time degree: Undergraduate headcount in the five undergraduate schools (does not include students studying abroad) less part-time headcount less full time non-degree undergraduate headcount less non-traditional headcount.
2. Non-traditional headcount: Full time degree candidates who are nurses returning to school for a BSN; anyone over 25 years of age as of the last day of the term; commuters (students living in Maryland or Virginia).
3. Average traditional headcount: the average of the total for the fall and spring semesters.

Condition No. 3

The Off Campus Student Affairs Program implemented and enforced by the Applicant shall specify that off-campus housing is a privilege that can be revoked due to student misconduct, whether a violation occurs on or off-campus.

A. The Applicant shall ensure that the Off-Campus Student Affairs Program is fully funded and staffed, and shall obtain the endorsement of the University's Board of Directors for the Program and its implementation.

B. The Off-Campus Student Affairs Program shall specify the measures that University personnel shall undertake, immediately upon receiving a complaint regarding student misconduct, to resolve any objectionable behavior pending the University's investigation of a complaint.

C. The Off-Campus Student affairs Program shall conduct at least annually a community education workshop that is mandatory for all students living off-campus.

Statement: The University has implemented and enforces an Off Campus Student Life Program. As a condition of enrollment in the University, all students agree to be bound by certain rules and responsibilities. Failure to comply with such rules, on or off campus, may result in discipline, including, for example, and in appropriate cases, removal from University housing or required on-campus residency as a condition of continued enrollment. The question whether a student's ability to live in off campus neighborhoods near the University can be described as a "privilege" consistent with the District of Columbia Human Rights Act is currently under appeal to the District of Columbia Court of Appeals.

A. The Office of Off Campus Student Life (OCSL) is fully funded and staffed. It is directed by Jeanne Lord, Associate Dean of Students. There is also a full-time Coordinator of OCSL, Julie Fultz. In addition, OCSL employs twelve part-time employees to staff the Student Neighborhood Assistance Program (SNAP). The Off Campus Student Life Program, as described in the Campus Plan, has been endorsed by the University's Board of Directors.

B. Upon receiving a complaint, the OCSL Coordinator:
- Calls the complainant, asks for a summary of the incident, and documents information in a log.
- Meets with the student(s) involved in the incident and documents information provided by the student(s).
- Assesses information collected about the incident (including complainant's information, student information, SNAP report, hotline report, MPD report and any other applicable information), renders a decision about the incident, if it is within her authority to do so, and, if appropriate, sanctions the student(s) involved in the incident.
- Refers the incident to the Associate Dean of Students or to the Office of Student Conduct, if the disposition of the incident exceeds the authority of the OCSL Coordinator. The incident is then handled in a manner consistent with the procedures set forth in the Code of Student Conduct, including, if appropriate, referral to a hearing board.
- Documents all findings and maintains records.

C. Four mandatory Community Education Programs were held for all undergraduate students living off campus on Tuesday, August 27, 2002. These students live in communities surrounding the University, throughout the District of Columbia, as well as in Maryland and Virginia. To accommodate all students, several make-up sessions were also held. As of this date, nine (9) of these students have not yet attended the orientation and have, as a result, had a block placed on their registration pending their meeting this requirement. This is a serious step because it means that until the block is lifted, these students cannot register for classes at the University for spring semester.

Condition No. 4

The Off-Campus Student Affairs Program shall adopt and enforce a Code of Student Conduct.

A. The Code of Student Conduct shall clearly describe appropriate standards of behavior, delineate misconduct that constitutes a violation of the Code, and specify the sanction that will be imposed for violations, particularly with respect to the consequences of repeated violations.

B. *The Applicant shall distribute copies of the Code of Student Conduct to students at least annually, and shall require students to certify in writing that they agree to adhere to the Code.*

Statement: Georgetown University has implemented and enforces a Code of Conduct for all students.

A. The Code of Student Conduct is clearly described in the Student Handbook on pages 155 – 200. The Code is publicly available on the University's web site. It sets forth appropriate standards of behavior, delineates misconduct that constitutes a violation of the Code, and describes the sanctions that may be imposed for violations, including sanctions for repeated violations.

B. The Student Handbook, which includes the Code of Student Conduct, is distributed to first year students. All upper class students are reminded of the Handbook's availability on the Georgetown web page and by CD rom. All off campus undergraduate students certified in writing at the Community Education Programs their commitment to adhere to the Code of Student Conduct.

Condition No. 5

The Code of Student Conduct shall provide that, once a complaint is received concerning a student's off-campus conduct, a University officer (e.g. the Vice President for Student Affairs or Assistant Dean for Off-Campus Student Affairs) shall determine whether probable cause exists to bring the complaint before a Hearing Board, thereby relieving the original complainant of the obligation to pursue the matter.

Statement: As described above under Condition No. 3, the Office of Off Campus Student Life and the Office of Student Conduct process complaints in a manner consistent with this condition.

Condition No. 6

The Applicant shall maintain a telephone hotline to receive complaints regarding student misconduct. The hotline shall be staffed 24 hours per day, seven days per week, by University personnel who shall keep a detailed record of each complaint received and shall forward each complaint to the appropriate authorities for immediate response.

Statement: The University hotline is staffed by the Department of Public Safety 24 hours a day, 7 days per week. Each call is recorded and the log is turned over to the Office of Off Campus Student Life every morning for review and appropriate action. The Department of Public Safety also forwards certain reports regarding alleged violations of District of Columbia law to the Metropolitan Police Department and to other

government agencies for law enforcement purposes. (See the University's responses to Conditions Nos. 7, 14.)

In addition, the Student Neighborhood Assistance Program (SNAP) operates Thursday – Saturday and other designated dates from 9 pm – 3 am. The purpose of SNAP is to immediately respond to student houses, which have been reported to the Georgetown University Hotline.

Condition No. 7

When the Applicant, upon investigation of a complaint or by any other means, receives evidence of a violation of sanitation or housing regulations involving or affecting students living in an off-campus residence, the Applicant shall report the violation to the housing provider, the Department of Consumer and Regulatory Affairs, Department of Public Works, or other agency as appropriate. The Applicant shall monitor enforcement of the reported violations to determine whether necessary inspections have occurred and whether fines have been issued and paid, and shall keep detailed records of reports complaints and responses.

Statement: When OCSL receives sanitation and housing complaints, the complaints are investigated and the disposition is handled in a manner consistent with the Code of Student Conduct.

Sanitation and housing complaints that are received by the Department of Public Safety are logged, and a letter with reported information is forwarded to the appropriate District of Columbia agency for law enforcement purposes. The agency is asked to inform Georgetown University of the outcome in each matter.

Condition No. 8

The Applicant shall ensure that complaints are heard by a Hearing Board comprising of two students and two faculty members, reflecting the University's recognition of the seriousness of complaints about student misconduct.

Statement: Pursuant to the procedures of the Office of Student Conduct, which administers the student disciplinary system, Hearing Boards consist of a minimum of two students and two faculty/administrators. (See also the University's response to Condition No. 3.)

Condition No. 9

The Applicant shall make publicly available data indicating the number and types of complaints received concerning student misconduct, and the outcome of each complaint, including whether sanctions were imposed and whether any fines paid. The Applicant shall also report this information quarterly to the Office of Planning, the Zoning

Administrator, ANC 2E, and the Alliance for Local Living, and to other interested community organizations that may request the information.

Statement: The Office of Off Campus Student Life maintains records of off-campus student
conduct-related issues and sends reports quarterly to The Office of Planning, the Zoning Administrator, ANC 2E and the Alliance for Local Living. The reports contain summary information regarding the number of Hotline complaints and confirmed incidents. The reports also contain aggregated information disclosing the number and nature of off campus students' violations of the Code of Student Conduct and sanctions imposed, including fines.

Condition No. 10

The Applicant shall report a violation of the Code of Conduct to the parents or guardians of the violator to the extent permitted by law.

Statement: To the extent permitted by law, Georgetown University contacts parents or guardians of students who are in violation of the Code of Conduct.

Condition No. 11

The Applicant shall avoid scheduling events that attract large numbers of visitors to the campus during the peak traffic times of 7 a.m. to 9 a.m. and 4 p.m. to 7 p.m. The Applicant shall employ campus personnel as necessary to direct visitors to the campus parking areas and to ensure smooth flow of traffic into and out of the campus.

a) All weekday evening performances at the Performing Arts Center expected to draw more than 100 visitors shall begin no earlier than 7:00 p.m.

b) Athletic events at Harbin Field expected to draw over 100 visitors shall begin before 4:00 p.m. or after 7:00 p.m.

Statement: The University has avoided scheduling events that attract large numbers of visitors during peak traffic times. While neither the Performing Arts Center nor the Harbin Field projects have been constructed yet, the University agrees to abide by this condition when they are built.

Condition No. 12

The Performing Arts Center, Harbin Field, and McDonough Arena shall be used for purposes related to the University or the community, and not for non-University events whose primary purpose is revenue generation.

Statement: The University will abide by this condition when these projects are constructed.

Condition No. 13

The helipad shall be used only for medically necessary purposes. The Applicant shall provide monthly reports regarding use of the helipad, including credible evidence of medical necessity associated with its use, to ANC 2E, the Alliance for Local Living, and other community organizations that request information.

Statement: The helipad is only used for medically necessary purposes. Reports of the use of the helipad are presented to the BZA Quarterly group, which is comprised of members of ANC 2E, the Alliance for Local Living, and various other community groups.

Condition No. 14

The Applicant, through its Office of the Registrar, shall maintain an accurate record of the license plate numbers of motor vehicles kept by all University students. The Applicant shall direct the students to register their vehicles in the District of Columbia or obtain a reciprocity sticker and shall consult with the D.C. Department of Motor Vehicles to determine whether such registration is completed or such stickers are obtained. The Applicant shall withhold parking privileges to students who do not comply with D.C. registration requirements. Failure to register student vehicles in the District or to obtain reciprocity stickers shall constitute a violation of the Code of Student Conduct.

Statement: The University through its Registrar, has informed all undergraduate students living off-campus of their obligations to comply with the District of Columbia law regarding car registration. The Registrar has of these students to disclose whether they are keeping a car in the District, and if so, to provide the license plate number. In addition, Office of Off Campus Student Life provided thorough education for off campus students regarding their obligation to register vehicles at the OCSL Community Education Program. To facilitate car registration, the OCSL also used that opportunity to provide students at the OCSL Community Education Program with a District of Columbia vehicle registration packet. To complement the Registrar's collection efforts, the OCSL collected vehicle registration information at the OCSL Community Education Program and forwarded it to the University Registrar. Students who informed the University that they were keeping a motor vehicle in the District that was registered elsewhere, received a follow-up letter from OCSL reminding them of their responsibility to comply with local vehicle registration requirements, and that failure to comply with District of Columbia law is also a violation of the Student Code of Conduct.

Our Department of Public Safety also informs the Metropolitan Police Department when reports of an alleged violation of the District of Columbia vehicle registration requirements are received. The University's Department of Public Safety logs the report and sends a letter to the Commander of the Metropolitan Police Department's 2nd District with the reported information. The letter asks that Georgetown University be informed of the outcome of the investigation.

In compliance with this Condition, OCSL has written a letter to the director of the District of Columbia Department of Motor Vehicles ("DMV") offering to consult with the DMV to determine if Georgetown University students who keep motor vehicles have registered those motor vehicles in the District of Columbia or obtained reciprocity stickers, if appropriate. No response has been received from the DMV.

Finally, the University grants parking privileges to students only in extraordinary circumstances, i.e., only to students who have documented medical conditions that require such parking. As noted above, the Code of Student Conduct makes clear that a violation of local law also constitutes a violation of the Code of Student Conduct.

Condition No. 15

The Applicant shall maintain a parking inventory of 4,080 off-street parking spaces within the campus boundary, and shall ensure that not more than one percent of the parking inventory is taken out of service at any one time.

Statement: The University maintains 4,080 parking spaces on the campus proper through a combination of striped and valet spaces. The number of valet spaces has been temporarily increased (in Lot T) during construction of the Southwest Quadrangle to maintain the full complement of spaces. Spaces were calculated by visually counting.

Condition No. 16

The Applicant shall enhance its Transportation Management Program:

> *a) to promote greater transit usage, including increased ridership of the GUTS bus service;*
>
> *b) to provide additional parking in satellite locations linked to the campus by shuttle bus;*
>
> *c) to work with the community, MedStar, and the Department of Public Works as part of a cooperative team effort to look at mitigation strategies for Reservoir Road.*

Statement: The University's responses are indicated by paragraph numbers, as follows:

(a) The fleet of GUTS buses was doubled in size last year to accommodate the ridership which has increased each year. The University is operating the buses on an increased frequency during rush hours to respond to an increase in University commuters coming from Dupont and Rosslyn Metro stations and from Arlington, Virginia. Buses run from 5 a.m. until 11 p.m. weekdays. A commuter bus offers a morning and evening run between Montgomery Mall and the campus each weekday. Buses run on University holidays to

accommodate MedStar and University employees who are required to work in essential positions on holidays.

b) Satellite parking has been increased to two garages in Rosslyn and two garages have been added on Wisconsin Avenue. Currently 370 faculty and staff whose offices are on the main or medical campus park in one of our satellite garages and campus throughout the day. The University has provided financial incentives to faculty and staff to volunteer to use satellite parking.

c) The University has met with the community, MedStar and the Department of Public Works regarding mitigation strategies for Reservoir Road.

Condition No. 17

The Applicant shall include, in all future applications for further processing of the campus plan, the following information:

A. Actual enrollment of traditional undergraduate students as of 30 days prior to the hearing date, including documentation and an explanation of the methods and assumptions used in the calculation;

B. Whether the Southwest Quadrangle project has been completed, and, if so, the date it began use as an undergraduate dormitory;

C. A progress report on the implementation and operation of the Off-Campus Student Affairs Program, including information on number of complaints received concerning student misconduct, reported violations, and outcomes, including what sanctions were imposed ad the fines paid, if any;

D. The number of off-street parking spaces within the campus boundaries, as of 30 days prior to the hearing date, including documentation and an explanation of the methods and assumptions used in the calculation; and

E. A status report on the Transportation Management Program.

Statement: Responses are as follows, by item number:

A. See response to Condition No. 2.

B. The Southwest Quadrangle project is under construction and is projected for completion for the fall semester 2003.

C. Please refer to the University's responses to Conditions Nos. 3, 4, 5, 6, 7, 8, 9, 10 and 14. The University has also submitted regular reports on this

matter to the Director, Office of Zoning. These submissions are dated April 18, June 28 and October 10, all 2002.

D. See response to Condition No. 15.

E. See response to Condition No. 16. In addition, the number of carpools has increased approximately 54% because of the University's offering of free parking guaranteed on campus. The number of employees volunteering to move to satellite parking facilities and GUTS ridership continue to increase as well.

Condition No. 18

The Applicant shall prepare a revised campus plan that is consistent with this Order, accompanied by table of changes that lists each page on which a change appears and describes each change. The Applicant shall submit an original and 10 copies of the revised plan to the Board no later than 90 days from the effective date of this Order, and shall, on the same day, serve a copy of the revised plan and table of changes on each party to this proceeding. Each party shall have 30 days in which to submit to the Board, and to serve on all other parties, its comments on the Applicant's proposed changes. Comments on the revisions shall be strictly limited to whether the revisions correctly and clearly reflect the Order. After review of the Applicant's proposed revised plan and the parties' comments, the Board shall determine whether further proceedings are warranted or shall certify the revised plan as the approved campus plan. The revised plan shall be deemed approved 60 days after submission, absent action by the Board before that date. Copies of the approved plan shall be maintained in the Office of Zoning and the Office of the Zoning Administrator.

Statement: The Applicant complies. The BZA certified the University's Campus Plan on March 5, 2002, by Order No. 16566-C, dated May 22, 2002.