THE CITIZENS
ASSOCIATION
OF GEORGETOWN

OFFICERS

Raymond J. Kukulski
President

Victoria G.K. Rixey
1st Vice President

Peter Eisler
2nd Vice President

Catherine Shaw
3rd Vice President

Gillian St. Lawrence
Secretary

John L. Hopkins
Treasurer

DIRECTORS

Karen Cruse
Derek V. Dilks
Barbara Downs
Barbara Zartman

LEGAL ADVISOR

Richard de C. Hinds

EXECUTIVE DIRECTOR

Juliet Zucker

March 31, 2003

Ms. Carol Mitten, Chair
Zoning Commission
441 Fourth Street, N.W.
Washington, D. C. 20001

Madam Chair:

Re: Zoning Commission Case 02-32
Georgetown University Performing Arts Center

Enclosed is the community's response to the post-hearing submission filed on behalf of Georgetown University in this further-processing case.

Please let us know if there is anything further the Commission requires for its April meeting. We very much appreciate the careful consideration you are giving this case.

Sincerely,

Barbara Zartman, Chair
Historic Preservation, Planning,
and Zoning Committee

Enclosures

ADVISORY
COMMITTEE

Thomas Birch
Bob Bird & Lil Hoik
Huntington Block
Richard G. & Maud Brown
Terence Collins
Hon. & Mrs. Rockwood Foster
John O. Hedden
Outerbridge Horsey
Hugh Newell Jacobsen
Jacqueline & Marc Leland
Stephen Kurzman &
Patricia Goldman
June & Jerry Libin
John D. Macomber
Lucy G. Moorhead
Evelyn Nef
Hon. & Mrs. Charles Percy
Simon Pinniger
Frederick Prince
John & Nina Richardson
Arnold & Louise Sagalyn
Ruth MacKenzie Saxe
Clyde E. & Joan Shorey
Peggy & Alec Tomlinson
James A. van Sweden

3222 N Street, N.W.
Washington, DC 20007
TEL: 202-337-7313
FAX: 202-333-1088
E-Mail: cagmail@cagtown.org
www.cagtown.org

ZONING COMMISSION
District of Columbia
Case 02-32
Exhibit 54

2003 MAR 31 PM 2:41
ZONING COMMISSION
DISTRICT OF COLUMBIA

ZONING COMMISSION
District of Columbia
CASE NO.02-32
EXHIBIT NO.54

Response to Post-Hearing Submission by Georgetown University and to Request for Further Information from the Commission

Condition 2 • The Enrollment Cap

The Commission asked for information concerning a number of elements affecting the determination of whether "averaging" was understood by the BZA to be the basis for figuring enrollment, whether the record back to the prior campus plan order gave such indication, or whether GU could have honestly believed the methodology had been approved.

The 2000 Plan. We believe there are two fundamental elements to look at in the current BZA campus plan process: The enrollment for the spring 2000 semester was 5516 students. GU reported this as the 2000 enrollment. Our records indicate the fall 1999 semester enrollment was 5840. Averaging those two semesters provides an average of 5728, which is 101 students over the cap.[1] This apparent error seems to have had a number of consequences.

All OP reports used the 5516 number and did not mention averaging. All their analyses used 5516 as a base, indicating their belief that this was the annual enrollment.

The 9/5/00 transcript indicates Commissioner Franklin believed the 5516 was the total enrollment: "My understanding, Madam Chair, is that there are still 111 students that could be enrolled under the existing 1990 campus plan ..."

Only when proceedings went into October was there an introduction of the averaging concept, deep in the 10/27/00 letter from Father O'Donovan, which itself was deep in a flurry of submissions by the applicant and parties. Yet GU's representatives continued to argue as though the 5516 were the accurate number. There is no indication that this was picked up by OP, the BZA or, apologetically, the community.

The 1990 Plan. As to BZA "acceptance," we find no reference to averaging in any materials from that 1990 plan or order. The applicant cites no such reference. In fact, the 1990 BZA order conditions any increase in enrollment on a correlating increase in beds on campus - in essence, no new heads without new beds. We are unaware of any method for "averaging" a bed.

GU acknowledges that the goal behind this provision relates to how many beds are needed for students. If there are 5000 students needing beds in the fall, the fact that there will be only 4500 students needing beds in the spring changes nothing in the fall semester's inadequacy.

We agree that the BZA attempted to categorize which students were to be included in the counts of students needing beds, e.g., non-full-time were excluded, as were older students. For reasons we have never been able to understand, students in English-as-a-second-language programs were also excluded, though potentially more than any others, they need housing provisions. (We have not argued GU should be required to house ESLs, who make up some 300 additional students, because we acknowledged the BZA had excluded this category from its definition.)

[1] Exhibit I of the campus plan refers to this number as the enrollment for "FY 2000."

The community's understanding. It was the inability to get consistent figures from university sources that was a constant frustration to the community. Over the last seven years we went from FTES to FFTEs to TFTUs to "headcounts," with GU always calculating the total as something less than the cap[2]

As you see in the 10/22/00 memo (attached), the community asked the BZA to help us find a series of definitions of students that would remain constant. It's what Commissioner Renshaw asked for during the 9/5/00 hearing: "... I'd like to request that the University submit an up-to-date count of undergraduate, graduate, nontraditional and foreign students in the University, please, so that we have -- We have a count from last spring, but I'd like it brought up to date." (emphasis added) Clearly there was no understanding of an annual average of semester enrollments; she would have been asking for data from two separate annual averages.

Even at the roundtable this Commission held to consider new regulations for campus plans on July 27, 2000, chaired by Chairman Hood, testimony filed by the same writer (attached) asked for clarification of this category issue. Averaging never came up.

We were unaware of averaging, though it might not have raised concerns about its use as a management tool if two semesters in which enrollment was under the cap were averaged for school administrative convenience. Indeed, we were always given a single number for each year's enrollment or projected enrollment, and we always (obviously erroneously) understood that this was the highest number of students who would be on campus.

Compliance in earlier "further processing" cases. Mr. Bergstein questioned whether the record in second-stage cases under the 1990 plan would shed light. There was only one case, as we recall: the new Southwest Quad Dormitory. There was a request from the community for a strong order emphasizing enrollment limits, but the BZA did not address the issue. And averaging was not mentioned.

[2] *We still do not have a firm definition of "commuter" students (excluded from the cap), residents of Maryland, Virginia, and the District who supposedly don't need beds. An initial review of the listings in the student directory shows many of these students have local addresses; some of those without a Georgetown-area address indicate their homes are as far away as Annapolis.*

Condition 3 • Off-campus Student Affairs Program

The introductory phrase. As to living off-campus being a privilege, our argument was that the VP for student affairs had indicated on the record at a GU-called meeting he had no intention of upholding such a policy, and that GU had in fact done the opposite in at least one case that is documented. Chairman Mitten is correct in that the current BZA order did not require GU to take particular steps to implement this. We merely ask that GU be precluded from doing the opposite, encouraging or permitting students with records of bad performance to leave campus and live in the community. This was even a request from the ANC that narrowly endorsed the GU proposed plan.

We are pleased that GU has in fact moved one student back onto campus. Mr. Hood's call for "a little more compliance" with something included in the order for a reason reflects a concern we have cited throughout the proceedings: the difference between motion and progress.

Condition 3 (a) Chairman Mitten is correct: This condition of the order requires GU to fund and staff the Off-Campus Student Affairs Program and obtain the endorsement of the University's Board of Directors for the program and its implementation. We accept that funding has been made available to support the program and that the Board has adopted a statement.

Condition 3 (b) We agree with Chairman Mitten that Condition 3 (b) merely requires GU to include some statements in its Off-Campus Student Affairs Program. But isn't the point of specifying remedies that the remedies would be put to use? Isn't Mr. Hood correct in reasoning that the BZA wanted to have behavior affected?

Many of the off-campus student houses that present the most egregious problems house GU sports teams. Surely GU should be able to affect the behavior of those who represent the school in athletic competition, even revoke the privilege of living off campus if they won't revoke the athletic representation.

Condition 3 (c) Georgetown does indeed hold annual workshops for students living off-campus. We imagine that some students' behavior is improved because of this event. However, the cognitive dissonance between what is said at this session and what students in fact get away with teaches a far more powerful lesson.

However, Condition 5 speaks of "a student's off-campus conduct;" Condition 6 speaks of a hotline to "receive complaints regarding student misconduct;" Condition 8 speaks of "recognition of the seriousness of complaints about student misconduct;" And surely Condition 4 was not meant only for off-campus students.

Of course, the categories are not so easy to separate: large, loud parties at houses occupied by off-campus students are frequently attended by on-campus students, whose youth prevents drinking in commercial establishments (at least without the risks attendant to use of false IDs).

Two other citations are illuminating: In the 9/5/00 transcript Ms. Kress (discussing materials sought by the Board): "...Also, you are looking for more definitive sanctions for on- and off-campus housing and on-and off-campus students and adverse effects that they bring to the community," and Ms Renshaw: "Also, information about how the Board of Review operates. That would come under the first item, the standards of behavior on- and off-campus ..."

But the best evidence has been provided by GU itself. The documentation recently provided includes the memo of October 22, 2000 from the community (we have attached the complete document) raising our concerns about GU's then newly proposed off-campus housing program, and our reading that it would affect only students living off-campus: A. 1, E: "... the new measures affect only behavior of off-campus students."

The point-by-point response prepared by GU (attached) in its third bullet reads: "All student conduct is included - both on and off campus. Thus, even students walking to and from campus are subject to the Code of Conduct." (emphasis added)

Condition 14 • Motor Vehicle Registration

We have not seen any material from DMV, nor was there a reference in GU's post-hearing submission to any GU materials or analysis.

Once again, in dealing with this condition, GU confuses motion with progress. Distribution of information was not the goal of the Board's order' registration of vehicles was.

As you know, residents of the District are required to register their vehicle with District DMV for several reasons: their registration fees support the maintenance of the roads they use, the District's inspection system aims to assure that vehicles are safe and nonpolluting, the requirement for particular insurance coverage by firms that operate in the District eases the process of redress for other residents who are victims of accidents. Similarly, the issuance of District Driver's Licenses assists in monitoring the driving behavior of persons operating vehicles in the District. It is not unreasonable that the Board directed that GU students operating vehicles in the District comply with these rules.

GU has, as directed, made it a violation of the Code of Student Conduct to fail to register vehicles, but has any student been sanctioned? We cannot tell from the generalized reports we receive.

We ask that the Commission require fulfillment of this condition, which GU can do without violating FERPA. As we have suggested before, they should simply require that, as students arrive for summer programs or the fall semester, they advise the Registrar of any vehicle they use in the District and require that, within 30 days, the student provide the Registrar with a photocopy of the new registration.

Conditions not referred to at Commission hearing

We would ask that the Commission consider two other elements we have raised:

- Failure to comply with Condition 13, providing evidence of medical necessity for use of the helipad in written monthly reports, and

- Removing from campus the track that was central to the track and field program, relocating it in the neighborhood; we believe this should be the subject of a further-processing application.

Attachments

(in chronological order)

Attachment I

GEORGETOWN UNIVERSITY FY 2000 ENROLLMENTS

Fall 1999 Graduate Enrollment*

Graduate Course FT Headcount	Graduate Course PT Headcount	Graduate Thesis Reaseach Headcount	Graduate Continuous Registration Headcount	Graduate Total Headcount	Graduate Financial FTE	Medical Headcount & FTE	Total FFTE & Headcount
1699	624	473	44	2840	1869	720	2589

* Graduate School, School for Summer and Continuing Education, School of Medicine

FY 2000 Undergraduate Enrollment

Total Headcount	Undergraduate Headcount	Undergraduate Part-time Headcount	Undergraduate Full-time Headcount	Undergraduate Full-time Non-Degree	Undergraduate Full-time Degree	Non-Traditional Headcount	Average Traditional Full time
12178	6166	324.5	5841.5	160	5681.5	166	5515.5

This information is based on reports generated by the Office of the University Registrar.

Maureen E. Dwyer
202.457.7860
mdwyer@wilkesartis.com

Wilkes Artis

Chartered
Attorneys at Law

Suite 300, 1666 K Street, NW
Washington, DC 20006-2803
202.457.7800
Fax: 202.457.7814

July 11, 2000

BY HAND

Ms. Sheila Cross Reid, Chair
District of Columbia Board of Zoning Adjustment
441 Fourth Street, N.W.
Washington, D.C. 20001

Re: BZA Application No. 16566
Georgetown University Campus Plan

Dear Ms. Reid and Members of the Board:

During the course of the June 13 public hearing on the University's campus plan case, Georgetown University was asked to provide additional information for the record. Additionally, questions were raised by the Board in response to which the University would like to provide clarification. This letter, with attached materials, is in response to the Board's questions and requests. Specifically the following information is provided:

- Information on MedStar, the helipad and the proposed Physicians Office Building.
- Further description of the undergraduate and graduate student populations.
- The University's housing program and what properties are included.
- Information on calls to the University's Hot-line.
- Draft conditions for the BZA Order which address the scheduling of events at Harbin Field and the Performing Arts Center.
- Information on the updated traffic data used by the Federal Highway Administration (FHWA) in its Environmental Impact Statement (EIS) for the Canal Road entrance.
- Information on the University's Alcohol and Substance Abuse Program.
- The existing and proposed Gross Floor Area for the campus.

The information provided by the University and MedStar for the Physicians Office Building fully satisfies the legal requirements.

Student Population

a. Traditional Undergraduate

In the 1990 Campus Plan, for purposes of the enrollment cap the BZA defined the undergraduate population to "not include nontraditional students such as women returning to school, English as a second language students, commuters, and other nontraditional students not requiring housing." (BZA Order No. 15302, Finding of Fact 19, page 9). 93% of the undergraduate student population is in the age range of 19-22 years of age.

At the time of the 1990 Campus Plan, the "Traditional Undergraduate" number was 5,287 and the University was permitted to add up to 340 additional students for an outside cap of 5,627. The University's current enrollment is 5,516, well within this cap. In fact, the University has added 229 above the 5,287 number, not the full 340 permitted.

The BZA also required the University to add one bed for each additional student and stated that "the University may provide these beds by: (1) moving graduate students and faculty off campus; (2) rehabilitation of existing buildings; or (3) construction of new dormitories." (BZA Order No. 15302, Condition No. 5, page 36.) As described in the summary attached as Exhibit 4, the University has added at least one bed per student (303 beds, which is more than the 229 students) and thus, this condition has been met.

b. Graduate Students

The graduate student population is not subject to a cap and was specifically recognized by both the BZA and the community in 1990 as being of an age and maturity level that would not cause an objectionable impact. The average age of the graduate student population is 30.1 years old and many are married with full-time jobs.

The impact of the graduate students is in terms of parking and traffic and those impacts have been included in the traffic analysis prepared by Gorove/Slade Associates. In fact, even though only 800 of the projected 1,284 additional graduate students would be on campus, the Gorove/Slade traffic analysis assumed the full 1,284-student increase would be on campus in order

Table 1
Undergraduate Students 2000-2010
Georgetown University
(This table is repeated from the Office of Planning June 12, 2000 report)

	2000	2003	2010
Total Number of Undergraduate Students	5,516	5,682	6,016
Beds on Campus (Students Housed)	4,273	5,053	5,053
Percentage of Undergraduates Housed On Campus	77%	89%	84%
Number of Students Living Off Campus	1,243	629	963
Percentage of Undergraduates Living Off Campus	23%	11%	16%
Number of Undergraduates Living Off Campus in Zip Code 20007	1,041	*528*	*809*
Percentage of Undergraduate Students Living Off-Campus Living in Zip Code 20007	84%	*84%*	*84%*
Number of Undergraduate Students Living Off Campus Elsewhere in Washington, D.C, Virginia or Maryland (Outside Zip Code 20007)	202	*101*	*154*
Percentage of Undergraduate Students Living Off-Campus Outside Zip Code 20007	16%	*16%*	*16%*

- All the numbers in this table are for full time traditional undergraduate students.
- The total number of undergraduate students in 2003 (5,682) is derived by adding 37 students each year in Fall 2000, 2001 and 2002 to reach the present undergraduate cap (5,627) and adding 55 undergraduates in Fall 2003.
- The beds on campus number assumes the Southwest Quadrangle is fully occupied in Fall 2003. The number of students housed on campus assumes all beds are occupied.
- In Spring 2000, 84 percent of the undergraduate students living off campus lived in Zip Code 20007 and 16 percent lived elsewhere in Washington, D.C., Virginia or Maryland (calculated using numbers provided by the University). **The Office of Planning used those same percentages** (84 and 16 percent) to show how students living off campus **might be distributed** in Zip Code 20007 and elsewhere in the city and suburbs in 2003 and 2010 if the percentages remained the same (percentages and calculated numbers shown in *italics*). The actual number living in Zip Code 20007 in 2003 and 2010 could be lower or higher.

Source: Table prepared by the Office of Planning, using data provided by Georgetown University.

Barbara Zartman, Commissioner
Advisory Neighborhood Commission 2E 04

Statement for the Roundtable on Campus Plans
July 27, 2000

On behalf of the Committee of 100 on the Federal City, I am here to say that we are not yet ready to submit recommendations about the campus planning process. We very much hope that the record will remain open, if there is not an additional session for live testimony. Within the next 30 days, we will have recommendations and hope that this is a workable timeline for your plans.

As Barbara Zartman, commissioner for ANC 2E 04, I would like to offer some general comments on the process by which campus plans are adopted - and then some specific recommendations that that focus on how the process can be made more reliable, more objective.

The first of those observations is that one size does not fit all. The communities in which universities and other campuses are sited vary greatly. The level of impact in a fully built or historic community may be greater than the consequence of the same program carried out in a less intensely developed community. Similarly, a community served by MetroRail cannot be compared to one that is still dependent upon cars and buses.

The same rule applies to the calendar. Not all campus plans should be for the same number of years. Yes, I am thinking of the Georgetown University situation at the moment, but the example makes the point. When an institution is proposing significant amounts of change, when its own leadership is in transition, a campus plan should span a shorter period, so that change and adjustment are possible.

The purpose of colleges and universities needs to be clarified, especially as it relates to accessory uses. Is the generation of revenue a sufficient purpose to allow activities on campus? If so, a university arena becomes an entertainment venue and rock concerts can move into our residential neighborhoods. Why not other revenue generators (if I were still in New York, I know the example would be an OTB parlor)? Perhaps an H & R Block tax service as an accessory to business school classes? A return to the comprehensive plan and its language about protecting residential neighborhoods is instructive.

As to specifics, let me offer the following:

1. The way in which student numbers are calculated should be made consistent, comprehensive, and transparent. The same formula should exist for counting real bodies, counting FTEs, counting traditional students, counting graduate students. The numbers should be presented across the last two plans an institution has prepared, and in the new proposal. There should be a grid that translates the numbers from one form

of nomenclature to all others, and the process for calculating them should not vary from school to school. Moreover, the "loopholes" should be eliminated. ESL students, for example, are not required to be included in the calculation, and yet we understand that they can constitute hundreds of additional "real body" students.

2. The way in which the impact colleges and universities is measured has to be changed into an objective series of measurements. We have recommended some of the elements that need to be included in a matrix of impacts: summonses, police citations, arrests, documented violations, DPW citations, DCRA citations, as well as traffic data.

3. In communities where traffic impacts are problematic, annual traffic counts must be taken during the life of a plan, yes, paid for by the college or university. The locations for the counts must be identified jointly with the residential community, as must the timing of the counts.

4. The financial impact of colleges and universities is frequently included in draft campus plans, but it is almost always limited to one side of the ledger. There are no costs for additional police overtime, or the absence of police to respond to citizens' calls for help away from student-impact areas. There are no costs for additional DPW inspections, pickups, and the like. One university consultant recently assessed the financial impact of a house converting from student occupancy to owner occupancy to be at least $7,500 a year in just income and sales tax. Multiply this by the hundreds and hundreds of student group homes that spring up when colleges do not house their students on campus and the impact is multi-million dollars losses to the District over the life of the campus plan.

5. It should include baseline figures, not just square footage of new proposed buildings "pasted on" to the last "certified" number. The Zoning Administrator is required to certify the accuracy of FAR numbers: how can he do that without baseline numbers? If the Zoning Administrator is to have these numbers, why not other parties?

you know, get drunk. That does not mak me.

9/05/00 TRANSCRIPT

Now in that regard, from both Ms. Renshaw and Mr. Franklin I think I heard you say that you do not want to -- that you want to keep the cap as it is.

BOARD MEMBER RENSHAW: Yes.

CHAIRPERSON REID: And I think I heard you say that you want to withdraw -- I mean withhold the decision as to what the cap should be until a time certain in the future wherein there has been an opportunity to be able to make an assessment as to what, in fact, we feel Georgetown has done or is doing in order to ameliorate the negative impact.

COMMISSIONER FRANKLIN: Right. My understanding, Madam Chair, is that there are still 111 students that could be enrolled under the existing 1990 campus plan, and I don't propose, at least in my present state of mind, to revoke that.

Ms. Renshaw may be of a different mind on that, but I certainly don't feel that I'm comfortable increasing the enrollment above the 1990 cap until there is some indication that the adverse impact is being brought under control.

If I could add a few more points, Madam Chair, to what I had said earlier: There has been

much made of the fact that students are a protected class under D.C. law, and I frankly regard that as basically irrelevant to what we are talking about.

Any standards that are imposed on students by the University that make them behave in accordance with civilized norms is not a violation of that particular law. So I think it's kind of a red herring to even talk about it at this stage.

The University has also indicated that a change in administration is sort of irrelevant to what we are talking about. I don't think so. I agree that every administration is subject to the standards set by the governing body.

Therefore, it strikes me that it would be very desirable, if not essential, that we receive a statement from the governing body of the University that embraces the standards of the off-campus housing program and that also clarifies that resources will be allocated to that program that are adequate to make it effective; in other words, that the governing body has to recognize the centrality of that program to the approval of a campus plan.

That would go a long way to providing at least me some comfort in knowing that a change in administration will not make a difference to how that

program is carried out.

MS. KRESS: Madam Chair, it appears from what I'm hearing that you are not prepared to go ahead with a decision today, but that you are looking for some additional information.

If I could suggest that you may wish to reopen the record for certain definitive information. If you would like, I'll give a try at a few of those items, and then perhaps you can add to it, to help move things along.

The first item I have made a note of is that you are looking for more definitive standards of behavior for the off-campus student housing, and those to be approved by the governing body of Georgetown.

Also, you are looking for more definitive sanctions for on- and off-campus housing and on- and off-campus students and adverse effects that they may bring to the community.

CHAIRPERSON REID: And the sanctions not to include expulsion, possible expulsion.

MS. KRESS: I was going to go on with the next item of not to exclude expulsion, but also then in conjunction, as I heard you, what resources will be brought to effect or implement the off-campus/on-campus student program, housing program, as it relates

to the adverse effects to the community.

I have also written down a request of the ANC to submit a paper on what they consider to be the appropriate behavior of students as they interact in the community.

Then heading a different direction, I have an item that you are looking for a more definitive program regarding future on- and off-campus housing as it relates to a possible increase in its student population.

BOARD MEMBER RENSHAW: Also, information about how the Board of Review operates. That would come under the first item, the standards of behavior on and off-campus, a statement by the governing body, and also information on how the Board of Review operates.

Also, we requested that the community reach out to the -- or to you, reach out to MPD, asking for the reinstatement of MPD PSA coverage as handled by Lieutenant Burke.

MS. KRESS: So that would be their proposal as to how they would do that outreach.

BOARD MEMBER RENSHAW: Proposal, and also we have made, or I had made, a recommendation on the registration of vehicles, that the University keep a

record. Perhaps that could be addressed --

COMMISSIONER FRANKLIN: And a record of infractions.

BOARD MEMBER RENSHAW: And a record of infractions.

MS. KRESS: So you would like to have a proposal from them, how they would --

BOARD MEMBER RENSHAW: Handle the vehicles and the infractions.

MS. KRESS: Registration and infractions.

COMMISSIONER FRANKLIN: Also, Ms. Kress, the expansion of the Georgetown University police role itself seems to me to be relevant. Obviously, the MPD has got limited resources, and I understand there may be some limitations on what the Georgetown University police themselves might be empowered to do in terms of arrest authority and the like. But they certainly, it seems to me, be empowered to make sure that the identification of students that are causing trouble is made plain.

MS. KRESS: I would make that a subheading under the resources that they are willing to bring to effect or implement the program.

COMMISSIONER FRANKLIN: Yes. And I suppose we should agree that, if somebody is expelled

from the University, that they can be replaced in terms of the new enrollment. In fact, I'm almost inclined to say they could enroll two or three in place.

CHAIRPERSON REID: Ms. Kress, did you also mention my recommendation regarding the involvement of the student council?

MS. KRESS: No, I didn't, and I didn't because I think -- I don't know -- depending on how long you want to leave the record open, realistically I don't know how quickly the student council could get together and take action to get information back. But if you would like, I will put that on the list.

CHAIRPERSON REID: Well, you know, my thought was that the development of the off-campus housing management plan be done in conjunction with the student council so that many of the recommendations and sanctions would come from the students, from the student body.

MS. KRESS: I think that's excellent. You're asking for a program of how that could be effected and how they could be included, and I think that's a better way of perhaps getting it.

CHAIRPERSON REID: Exactly. Yes.

BOARD MEMBER RENSHAW: I just want to make

a comment here. What I would love to see, and a turnaround for Georgetown University, is for the student government to take the lead forming a consortium of student government entities with all the universities within the city to address the similar problems that these universities are facing.

We know about them, because we have to deal with these campus plans.

CHAIRPERSON REID: And we also see them on television.

BOARD MEMBER RENSHAW: And we see it on television and read about it in the newspaper. So we pick up and read a headline, and we think it is perhaps the campus plan that is before us and, lo and behold, it's another university. But wouldn't it be a wonderful effort of this university to show that it has reached out to the other universities, the student government leaders are coming together, and they are going to address such things as student housing in the community, drunkenness, vehicles parked illegally, all bad behavior, student conduct; and put the charge on those student government leaders to come up with something that's meaningful for every university within the city.

CHAIRPERSON REID: Now I don't know if we

can --

MS. KRESS: That's a suggestion, I think.

CHAIRPERSON REID: -- go that far, but nonetheless, I think that --

BOARD MEMBER RENSHAW: Loaded.

CHAIRPERSON REID: -- your point is well taken, Ms. Renshaw, and I think that the governing bodies at Georgetown hear you and, as such, can make the appropriate decision as to where they want to go with that.

So I think that it's something that certainly should be -- that they may want to take in consideration, however, not necessarily a part of this particular order or recommendation from this Board directly, but as an individual suggestion that perhaps they will take in consideration. However, I do want to make sure that the recommendation we did kind of formulate here in regard to the students being the owners of responsibility we put on the student themselves to come up with these sanctions and penalties and so on be done with the university, so that they will not be too lenient, that once they have done it that the university will step in.

I think the university understands the seriousness of the campus plan being in jeopardy if,

in fact this is not being addressed appropriately.

Now only one other thing that I had wanted to mention was this hotline business, which I felt was like really ludicrous in that you have an answering machine answering a hotline that reminds me of like a suicide hotline.

If someone called and no one is there, so if you have a problem with someone yelling and screaming out in front of your house or urinating in your yard, you want someone to respond immediately. So perhaps they could make sure that line is manned 24 hours a day by someone, you know, a physical individual rather than the answering machine, so that it won't come across as being a joke, that it will be someone who can dispatch appropriate action as necessary as the calls come in.

This is something that I feel that, once it's taken up and it becomes a reality, that it's probably something that will not have to be continued over a long period of time. Once they implement it and have it in place for a while, then my guess would be -- my judgment would be that the number of complaints and calls would decrease such that they don't have to necessarily have someone there physically answering the telephone but could have some

type of apparatus in place where the call could be forwarded to an appropriate individual who could take care of the problem 24 hours.

You know how they have at the hospital, doctors on call -- have someone on call or something like that. But, nonetheless, like I said before, George Washington University is a great university with some of the greatest minds in the world. So I'm sure that they would be able to work this out.

MS. KRESS: Madam Chair, I'd like to suggest, because I know you have still a busy morning, that we perhaps set -- We need -- I would think everyone would like to get this transcript, because this has been a very packed hearing -- I mean meeting, and to allow for that and to allow a time for the response to the questions, I feel that we need at least a month, the decision to be in November. But do you want to -- Do you have some tentative dates on when the applicant needs to submit the responses and then when the amount of time for the other parties to be able to respond, please?

MS. PRUITT: Certainly. We are at the fifth now. It usually takes us at least two weeks, two and a half weeks, to get a transcript which would put us about the 20th or, let's say, the 22nd.

So I would suggest that the --

MS. KRESS: And then the applicant needs at least two weeks.

MS. PRUITT: Right. I would say two weeks would make it October 6th for the applicant to get information in to us, and then why not give two weeks to respond, which would be the 20th. That would still give us enough time to put the package together for November, for the November 7th meeting.

MS. KRESS: Eighth.

MS. PRUITT: Eighth, because of election. Excuse me.

MS. KRESS: Thank you.

MS. PRUITT: Okay. Excuse me.

CHAIRPERSON REID: Then I think that it should be made very clear to all persons involved that there will be no decision today and that there will not be any decision made, period, until such time that the Board is convinced that -- in that they ever are convinced that these issues have been addressed to our satisfaction.

MS. KRESS: But tentatively, it will be on your November 8th agenda to review the materials you have.

BOARD MEMBER RENSHAW: Yes, and I'd like

to request that the University submit an up-to-date count of undergraduate, graduate, nontraditional and foreign students in the University, please, so that we have -- We have a count from last spring, but I'd like it brought up to date.

MS. KRESS: We'll put that on the list as well.

CHAIRPERSON REID: Mr. Franklin?

COMMISSIONER FRANKLIN: The only thing I have to add, Madam Chair, is that I think that the University and the community should understand that I don't think we are taking these measures in a punitive frame of mind.

It's really mostly a plea for the reallocation of resources to the off-campus housing program, so that within the existing revenue stream of the University it can become effective before we, in effect, open up that revenue stream for further enrollment.

CHAIRPERSON REID: Thank you. All right.

MS. KRESS: Thank you, Madam chair.

MS. PRUITT: I just wanted to make it clear for the audience, too, that the record is only open for those items that the Board requested. So it's not taking in any additional letters or anything

in reference to the University.

MS. KRESS: It's a limited reopening of the record. Thank you. Do you want to go ahead with Field School, Paul? Oh, you want to break? Oh, that's right. You wanted to break right now.

CHAIRPERSON REID: Okay. We will take a recess at this time. We will be back shortly.

(Whereupon, the foregoing matter went off the record at 10:58 a.m. and went back on the record at 11:26 a.m.)

MR. HART: Madam Chair, the final application of the morning: 16559, application of The Morris and Gwendolyn Cafritz Foundation/The Field School, pursuant to 11 DCMR 3104.1 for a special exception to establish a private school under Section 206 for a maximum of 320 students and a maximum of 74 faculty and staff in the R-1-A District at premises 2301 Foxhall Road, NW (Square 1341, Lots 856, 861, 878 and 879).

The Board discussed the application at its March 15, March 29, May 10 and July 25, 2000, public hearing sessions. The Board completed hearing the case and indicated that the following submissions be made:

The results of further dialogue between

Community response to the applicant's 6 October 2000 submission
Georgetown University campus plan, BZA application number 16566
October 22, 2000

This document consists of three parts:

A. Response to the applicant's cover letter
B. Critique of the "point by point" chart that was entitled "Response to BZA's Request for Additional Information"
C. A summary of the community proposals for the campus plan that are relevant to the applicant's response.

In addition, the submission includes several appendices.

A. Response to cover letter

1. Regarding enrollment: We acknowledge that, as described in their recent filings, the University has implemented several measures intended to reduce the negative impact of off-campus students on surrounding neighborhoods. **We disagree strongly** that these measures "address the issue of impacts from its students off campus so as to enable the Board to approve the increase in enrollment."
   D. First, the new measures have not been shown to significantly reduce off-campus student impact. To the contrary, the impact this year appears to be worse than ever, despite the unilateral implementation by the University of most of the elements of its plan. Documentation of continuing negative impact is attached in Appendix A. Certain elements of the plan have been in existence for years, others for a few months. The plan has no record of effectiveness, and any modest benefits it does produce could be far outweighed by the negative effects of increasing enrollment.
   E. Second, the new measures affect only behavior of off-campus students. Other neighborhood impacts noted in testimony were not addressed. These include negative effects on parking, traffic and housing.
   F. We note that **the University still refuses to provide full-time equivalent enrollment figures,** as specified in the approved 1990 campus plan. As noted in our testimony, "full-time equivalent" enrollment seems to be higher than "traditional full-time undergraduate" enrollment. **The current reported enrollment, 5840 "traditional full-time undergraduates" is very high** and may lead to a violation of the 5627 FTE enrollment cap for the year–even in terms of this different unit of measurement.
   G. It appears that, in addition to unilaterally implementing its own behavior management plan, the University is also unilaterally increasing its own enrollment cap. The point by point response chart indicates that the University's target enrollment for the current year was 5677, in excess of the existing 5627 FTE cap.
2. Regarding on-campus student life: The community supports the projects in the campus plan that seek to "re-center student life on campus." We believe that these projects should be given priority over other elements of the plan. However, we have asked that non-student use that could burden the neighborhood be restricted for all of the projects named in the letter–the Performing Arts Center, McDonough Arena and Harbin Field.

   We applaud the decision of Dr. Juan Gonzalez this year to oppose holding the Student Charity Block Party on public space as in the past. We have long opposed this event as contributing to a student culture of drinking, and the University itself once effectively prohibited it. (Until recently, students in University housing were required to sign an agreement that they would not petition the city for a block party). However, the student

outcry resulting from the block party cancellation shows the great need for positive steps to build on-campus student life. This was the reason for our concern about the reports in September of a student affairs budget cut of $900,000. Our concerns have been only somewhat allayed by the letter in Exhibit F of the submission.

3. Regarding the University's claimed financial need: The University seeks to gain Board approval of a substantial enrollment increase by pleading poverty, saying that without the enrollment increase, it "simply cannot go forward with its plans" to improve on-campus student life. (Interestingly, when talking about the neighborhood impact, the enrollment increase is presented as "modest" but when discussing finances, it becomes a critical issue.) Such a linkage between the enrollment increase and specific projects has never been made before, either in testimony or in discussions. However, all testimony in this case has agreed that increased enrollment will mean an increased burden on the community, and that burden is already unacceptable. The University may simply have to accept limits to its growth.

   Regarding the argument of poverty, it is quite clear that the University possesses ample resources for implementing the projects in this plan. The University's published endowment is in excess of $625 million, and the University is in the midst of a very successful fundraising campaign with a goal of $1 billion. (According to the Sept. 25 edition of the University newspaper *Blue & Gray*, $600 million had been raised as of Aug. 31.) Audited financial statements, filed in connection with the transfer of Medical Center operations to MedStar Health, fail to support any claim of financial difficulty, **Audited consolidated financial statements show that Georgetown University's net assets rose from $668 million in the fiscal year ending June 30, 1994 to $1.05 billion in the fiscal year ending June 30, 1999.** This is a picture not of need but of prosperity. Thus, a decision not to proceed with certain projects in the plan would more reflect University priorities than financial hardship. We hope that the University will not hold student life hostage to other priorities.

4. Regarding a ten-year plan: The University argues that because it has made some provisions for reporting on the status of its off-campus housing program, that the Board would be able to approve the plan for a ten year term. We strongly disagree. This approach does not address the other community reasons for requesting a five-year term:
   - Impending change in University administration
   - Massive planned on-campus development prior to plan (Southwest Quadrangle, Canal Rd entrance)
   - Change in medical center type of use (MedStar purchase)
   - Nearby community development that affects traffic impact
   - Lack of quantitative information now about traffic and student impact

   The changes already underway will make the University in five years a very different institution. We plan to work together with the University and MedStar, as proposed here and in the University's submission, to obtain information on student conduct, traffic and other impacts. After five years, the plan should be revised and resubmitted for approval. A simple review based only on off-campus student housing would be completely inadequate.

5. Regarding plans for reporting to the community: The University's proposed means of reporting to the community are inadequate. We agree that the existing quarterly meeting procedure has been beneficial and should be retained. We also agree that the University should routinely report on progress with each new submission (see below). The University's letter does not specify what it means by "monthly reports to the community" or "annual reports to the community, the Office of Planning, and the Office of Zoning."

However, we do not support the University's group called "ALL" as a means of community involvement. ALL has no real structure, no procedures or bylaws, and its meetings are closed to the public and to the press. The present membership of ALL, which was selected exclusively by the University, consists largely of University-affiliated groups, and ALL proceedings will be managed by the University, so ALL cannot provide an independent assessment of University impact.

B. Response to applicant's point-by-point chart

Defects in the off-campus housing program	**The program contains nothing fundamentally new**, but is rather an expansion or extension of existing programs–programs that have decisively **failed to remedy the problems**. The Board rejected essentially this same program in September. More important than being "comprehensive" is being effective. However, **the new program is no more comprehensive** than the old programs from which it is composed. Among the negative impacts omitted are those involving housing (zoning and maintenance), which directly affect off-campus students' health and safety, as well as neighborhood quality of life. **The program's stated goals will not eliminate neighborhood impact.** ⇒ Reducing the number of repeat offenses will not reduce first offenses, which comprise a large portion of the problem. There are easily enough student houses to fill every weekend with noisy parties on first offenses alone. ⇒ The SNAP program might contribute to identification of potential problems, but SNAP personnel will not be equipped to effectively intervene. Contrary to its representation in the applicant's submissions, the ALL program is not community-wide but rather University-run. More detailed criticism of ALL is given below. **On-campus student conduct is not part of the program**, notwithstanding the applicant's statement, because the response and enforcement mechanisms don't apply to on-campus students, even when they are off campus. This is illustrated by hotline statistics reported in the chart, which are divided by whether the students lived on-campus or off-campus; no follow-up was done for on-campus residents. Yet disruptions by on-campus students are a serious problem off campus. **The program is reactive.** Response to problems is limited in time (Thursday, Friday and Saturday nights only) and in content (behavior problems only). At other times, residents can only leave a message and hope for follow-up, while for other problems there is no well-defined response mechanism. The primary response to problems at any time or of any nature is punitive, not preventative or curative. When imposed, sanctions are designed to discourage second offenses but not first offenses. **The program is primarily punitive.** It has no provisions–other than leaflets–for educating students on off-campus affairs and on their responsibilities and rights in the community. It has no provisions for advocacy by the University administration and faculty of civic responsibility

for students. Education and advocacy could be part of a dialogue in mandatory assemblies (like the former off-campus orientation), in the classroom, in student newspapers, or elsewhere. This has not been done. A purely punitive program cannot succeed at Georgetown.

A weak Code of Conduct has not been the problem, so a stronger Code won't be the solution. The Code of Conduct has always had strict sanctions but weak application of sanctions has historically undermined the effectiveness of enforcement. It will be difficult to monitor this in the future because of the University's refusal to disclose sanctions decisions.

The ALL program cannot be called a "partnership." This program has been grossly misrepresented in the University's submission.

⇒ It was established without community input, and membership and attendance are "by invitation only." As far as we know, there have been no commitments to participate by any city agencies or neighborhood organizations. Those from the community who have attended meetings have done so as individuals, not community representatives.

⇒ Participants have no defined authority to set procedure or call meetings.

⇒ ALL has no authority within the University to make decisions or implement actions.

⇒ To date, there have been only two ALL meetings, the first of which was primarily organizational, and no fixed goals or plan for future action has been established.

⇒ Contrary to the applicant's October 20 submission, ALL has not been "well received by the vast majority of the community." In the interest of cooperation, several community members have attended ALL meetings, but ALL has not been accepted by the community. (See Appendix B.)

⇒ The essential problem with ALL is its fallacious premise that student conduct problems are to be solved by changing the surrounding community rather than the University community.

⇒ In fact, a community-wide program should not be the primary approach to long-term resolution of conflicts; instead, the University must take steps to change its <u>own</u> culture. Problems and suggested solutions have been identified by past University task forces, notably the May 1999 *Report of the Campus Culture Task Force.* The recommendations have, in the main, not been implemented. (The Executive Summary and Recommendations of the task force are attached as Appendix C).

Resources devoted to programs that directly affect off-campus student impact are only slightly increased over previous years.

⇒ Citing the number of hotline staff persons is misleading because the staff works part-time.

⇒ Bulk trash collection is an ongoing program which has been allocated no new resources. The management and budget cited are basically unchanged.

⇒ Additional staff assignments outside the Off-Campus Student Affairs Office reflect no significant long-term increase in activity.

⇒ The monies spent in fall 2000 amount to about $5 per off-campus student, and are insignificant in the context of the annual student affairs budget.

Reporting indices for tracking complaints	**Defects in the University's information sharing:** ⇒ Information reported by the University has not been in writing. To date, almost all information we have received from the University has been oral, and so has been hard to retain and verify. ⇒ Information has not been given proper context. Statistics should be presented in full, but not without related information to give it meaning. At a minimum, incident reports (like hotline calls) should include figures from the previous year. Such data was omitted from the applicant's present submission. Hotline call reports should also include details like the address of the disturbance and the ultimate resolution of the problem. **The University's proposed indices are useful but incomplete.** They understate the seriousness of the problem, to an unpredictable degree: 1. The volume of hotline calls depends on community perceptions of the hotline's effectiveness. Community confidence in the hotline is now at a low level. If student disruptions increase, hotline calls could paradoxically drop as community confidence declines. 2. Metropolitan Police Department reports depend on the availability of officers and the nature of the disruptions. As relatively low police priorities, noise, drinking or public nuisance complaints are likely to be bypassed if there are other demands, and arrests are rare. Short-time or mobile disruptions (walking through the community, or moving parties) are hard for police to catch and are often not reported for that reason. No record is made by police of calls for service that result in no action. 3. The University Department of Public Safety is permitted to officially patrol only within the campus boundaries. Their reports will provide little information about off-campus problems. 4. All of these indices relate only to student conduct problems. They will not measure housing law violations, complaints about property maintenance, landlord-tenant issues, parking violations, or many other issues that cause problems for students in the community. **Even with their flaws, University statistics show a serious impact.** In a one-month period alone, there were many incidents–57 hotline calls and 26 alcohol or behavior arrests. And as we have argued, these probably significantly underreport the problem. **We urge that the Board consider the community's request for a full-time hotline** that would receive, follow up on, and log community complaints about any University-related problem. The request is detailed in the following section, "Community Proposals", as item #2. If such a hotline were credible to the community, it would provide a very useful record. We feel that at this time there is no objective index that reliably measures University impact on the neighborhoods. The Board must continue to acknowledge the importance of citizen input like that obtained in the campus plan approval process. It is unfortunate that, while the University reportedly tasked three individuals to develop these indices, no community input was solicited. Other

	community recommendations for indices are listed in the section, "Community Proposals", as item #3.
Code of Student Conduct	The changes in the Code appear to be improvements. The additional sanctions increase the possibility that some sanctions will be applied when needed. **However, the problem is not with the Code but with the way in which it is enforced.** ⇒ There is plenty of room for leniency in the new Code; for example, co-curricular sanctions include suspension from athletic performances, but the term of the suspension is set by the Dean and the coaches–it may be just a few games. ⇒ University refusal to disclose when sanctions are imposed greatly reduces the deterrent effect of the sanctions on others. **Information to students on University expectations is inadequate.** ⇒ The letter from the President of the University (Exhibit H) partly illustrates the problem. This letter was distributed not on letterhead, as found in the submission, but as email. Reading such a long and wide-ranging letter on email is not easy, and finding the specific information about the Code of Conduct is difficult even on paper. The President of the University has never made a clear, specific communication to the students on any topic related to neighborhood relations. ⇒ The letter of Exhibit H was sent on August 29; the following weekend (Labor Day) was one of the worst weekends for student noise in recent history. ⇒ Informational fliers to students have been distributed as leaflets throughout the neighborhoods. Many of these are ignored and blow away. ⇒ Evidently the University proposal to have all students sign a document committing them to responsible citizenship and the Code of Conduct has not been implemented. Even this is no guarantee of understanding or compliance.
Mechanisms for coordination with Metropolitan Police	**Evidently, no procedures were established for better prevention or improved response to inappropriate student behavior.** (For example, coordination between SNAP and MPD). ⇒ One new "mechanism" is reported: the procedure whereby a University officer retrieves weekly incident reports. ⇒ Student orientation meetings as described have been held for many years. ⇒ Assisting MPD in community outreach will hardly affect student behavior. ⇒ Cmdr. Newsham, Lt. Bray and Lt. Contee did not attend the second meeting of ALL; instead, they sent a representative.
Partnership with the Community	The 9 meetings detailed in Exhibit K of the submission include none (except the ALL meetings) specifically held to discuss student conduct and community issues. Most are community meetings that are usually attended by a University representative. There was one meeting (Oct. 11) to discuss underage drinking, which was organized by a University employee and co-sponsored by Mothers Against Drunk Driving. Amazingly, no advance notice of this meeting was provided to any community organization or to ANC 2E. The meeting was not

	advertised in or reported on in local media. Attendance from the community was very low (reportedly less than 20 individuals). Regarding the BZA Quarterly meeting on September 21: A single "feedback form" from that meeting is included in Exhibit M, signed by two individuals who were not present at the meeting (see the signup sheet in Exhibit L). None of us present at the meeting can remember any such "feedback form" being distributed there.
Partnership with DPW and DCRA	The measures described in the chart amount to very little. There is no partnership with either DPW or DCRA. <u>Partnership with DPW</u> DPW has assisted with the University's bulk trash pickup for many years. Such one-time assistance can hardly be called a "partnership". The community has worked closely with Tom Day, the DPW chief solid waste inspector. To our knowledge, the University has never met with Mr. Day to learn what is expected of group houses, what trash procedures are, and so on. The University's October 20 submission includes a form letter meant to notify off-campus students of trash violations. Factual errors in this letter are a good indication that it was not compiled with DPW cooperation. We have seen no evidence of University patrols to issue trash citations. Such a program has not been described in the University's plan, and no record of its accomplishments has been submitted. However, such a program should be implemented, and might serves as a basis from which to seek a partnership with DPW. <u>Partnership with DCRA</u> Evidently no partnership with DCRA exists, beyond a meeting with–or a telephone call from–ALL. The University's stated refusal to list illegal properties on the rental list is almost meaningless because it is based on the property owner's statement and not on a partnership with DCRA. The University should obtain information on compliance from DCRA and likewise inform DCRA if it learns–from student or neighbor report or its own investigation–of unsafe or illegal conditions in listed properties. The University should have a procedure to receive housing complaints and act on them. Furthermore, the University should make a good-faith effort to use information at its disposal to detect housing problems.
Registering student vehicles	The University evidently chose to disregard the Board's request for University registration of all off-campus cars. Neither SNAP nor any other University agent will cooperate in enforcing DC registration laws. Instead, the University has distributed fliers informing students of the law.
A "full-time hotline"	The University's hotline is grossly inadequate. It responds to problems for only certain times. Its scope is limited to disturbances from off campus–it can't even respond to noise complaints about University functions or from on-campus students. Even when functioning, it has not been supported by effective enforcement or follow-up.

	Because of its shortcomings, the hotline has low credibility in the community and is underutilized. What is required instead is the community proposal (above) of a full-time, broad-scope hotline.
Identify how the Board of Review operates	We're not sure if the response addresses the question the Board intended to ask. However, we can comment that probably the most crucial requirement of the plan is the support of the University President. The impending departure of the current President is an important reason to limit the term of any approved plan.
Provide an up-to-date count of students	This information is inadequate: ⇒ Despite frequent requests, no FTE counts of undergraduate enrollment have been submitted The information provided is nonetheless disturbing: ⇒ The current enrollment is very close to the cap and may well exceed it, depending on events in the spring. ⇒ More comments on enrollment are given above, in point #1 of the response to the cover letter.
Student Council response	We received the GUSA response only with the applicant's October 20 submission. The Board had asked how the student council would reach out to students with disciplinary problems. The response indicates ⇒ The Student Council does not support the University program ⇒ The Student Council has identified no steps to reach out to students with disciplinary problems; instead, it proposes a public relations program with "non-student residents."

C. Community proposals for the University's off-campus student program

1. Taking responsibility: The University must in principle and in fact take responsibility for actions of their students. Note that most GU undergraduates are young and from outside the DC area. The University, in enrolling them and inducing them to live in the community, has an obligation to ensure that they understand and comply with local laws and customs. Examples of areas where the University should bear ultimate responsibility are
   - Noise disturbances
   - Maintenance of housing and trash
   - Health and safety (housing codes and zoning violations)
   - Parking impact: ensuring that students park legally and register their vehicles as required by law.
   - Generally, compliance with all laws relevant to neighborhood impact.

   University responsibility in these areas should include establishing
   - Means to inform students of their obligations and of resources available to them;
   - Procedures to remedy problems arising from noncompliance (such as removing garbage and towing cars) and other problems (such as working to obtain housing inspections and to improve city services); and
   - Procedures to sanction students who cause problems. Sanctions could include means to reimburse the University for costs that it incurs in remedying student-caused problems.
2. Community hotline: The University should institute a hotline that is manned at all hours of the day, every day of the week, to take complaints or comments by community members

about all aspects of University operations. This hotline should not be limited to student disruptions, but should be able to address concerns about housing, zoning, traffic, malfunctioning equipment, and so on. All calls should be logged by tracking number, the operator should be empowered to take immediate action for urgent matters (including noise disturbances), and otherwise an initial response should be made within a reasonable time (by the next business day). The disposition of every complaint should be noted in the log. These logs should be part of the record for any BZA action.

3. Information sharing: The University should be required to share all relevant information with the community in writing, including:
   - Weekly reports of hotline calls (or similar communications) and relevant police reports
   - Off-campus addresses
   - Yearly counts of off-campus students by community within Zip code 20007
   - Sanctions imposed for misconduct off-campus
   - University actions in connection with the plan
   - Communications from the University to any city agency (including the BZA) regarding the plan. This includes any reports or minutes from meetings of public or private bodies charged with community affairs. (Such documents, if submitted to the BZA, should likewise be timely served on the parties to this hearing.)
4. Other proposals: Other community proposals which have not been implemented by the University include the following
   - The Office of Off-campus Student Affairs should be given funding one year in advance to ensure year-to-year consistency in its operations.
   - Off-campus residence should be considered a privilege requiring a record of good behavior. Students with past behavior problems should not be permitted to live off campus, and students living off campus who have proven not to be good citizens should be returned to campus for their senior year. This recommendation is supported by the ANC 2E position. (A similar procedure already applies for students in University-owned housing.)
   - Off-campus parties in non-university-owned housing should be registered in the same fashion as parties occurring in university-owned housing.
   - Varsity athletic teams should be required to live on campus, inasmuch as they represent a disproportionate share of the problem houses. The same rule should be applied to club teams. This provision could be a team-building benefit of participation in the sport, similar to the housing benefit we understand is now available to the basketball team.
   - The University should commit to working closely with city agencies like DCRA and DPW to ensure that the houses occupied by their students are safe and well maintained. (Programs described in University submissions are all short-term or poorly defined.)
5. Simple remedies that would greatly reduce negative impact were omitted from the applicant's submission, but follow directly from the evidence in this proceeding:
   - Provision of additional on-campus undergraduate student housing. All parties, including the University's expert, have agreed on the beneficial effect of this measure. In fact, the University already has facilities on campus not presently used for undergraduate student housing that would be suitable for that purpose now or in the near future. Furthermore, housing a greater fraction of undergraduates on campus is not as unusual or as great a burden as the University has implied. Most of the University's peer institutions house a greater percentage of undergraduates on campus than they do (see Appendix D).
   - Reduction in University enrollment. This would appear to be the Board's only recourse if the University proves unable to control negative impact in any other way.

GEORGETOWN UNIVERSITY CAMPUS PLAN
BZA APPLICATION NO. 16566

RESPONSE TO BZA'S REQUEST FOR ADDITIONAL INFORMATION

INFORMATION REQUESTED	UNIVERSITY'S RESPONSE
	As specifically requested by the Board, the University's off campus housing program is workable and comprehensive. Attached is a detailed description program and the University's Point by Point Response to each issue raised by the Board and the Community.
Develop and submit a workable off-campus housing program with specific attainable goals for undergraduate students. Identify the resources and staff that will be committed to achieving the program's goals.	• **The program is comprehensive.** All negative impacts from students are addressed – Noise Drinking Partying Parking Trash Disrespectful behavior. • **The program has attainable goals.** ➢ Reducing the number of repeat offenses (new and stronger sanctions). ➢ Proactive identification and intervention of potential problems (SNAP) ➢ Community-wide approach to long-term resolution of conflicts (ALL) • **All student conduct is included** – both on and off campus. Thus, even students walking to and from campus are subject to the Code of Conduct. • **The program is proactive in terms of new programs such as ALL & SNAP, educational and orientation materials (Exhibit A).** • **The program is responsive and decisive in terms of new and stronger sanctions (Exhibits A and B).** • **The program includes a new partnership with the community, city agencies, landlords, MPD, and students living off-campus (ALL).** • **The staff and resources have been committed:**

Reference to enrollment from Father Leo O'Donovan's letter of October 27, 2000
(the full letter was included in applicant's most recent submission)

Page 3, Item 5 Current Enrollment

Consistent with the BZA's approval of Georgetown's 1990 Campus Plan, the Georgetown student population historically has been using the definition of "traditional full-time undergraduate" students and has not been based on total FTE's. The BZA expressly endorsed this methodology in its 1990 Order because this formula focuses on students needing housing and therefore potentially affecting the community. In order to maintain continuity with prior Campus Plan approvals, the University continues to use the traditional full-time undergraduate definition. Thus, nontraditional students who do not need housing are subtracted from our undergraduate numbers.

In response to the statement that we may be currently exceeding the existing cap, please allow me to state that this is not the case. As we have indicated in our filing, the fall and spring "traditional full-time undergraduate" enrollment numbers have always been averaged to provide an overall academic year number. This method of determining enrollment, which has been accepted by the BZA, is employed by other local universities as well. As we have stated on many occasions, the fall enrollment numbers are historically higher than the spring total, when many students are studying abroad. When fall and spring numbers are averaged to arrive at a final number for the 2001 academic year, we will be clearly below our current cap.