MICHIGAN PARK CITIZENS ASSOCIATION

Washington, D.C.

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March 31, 2005

Carol J Mitten, Chairperson
Jerrily R Kress, Director
Clifford Moy, Acting Secretary
Zoning Commission
441 4th Street, NW.
Washington, DC 20001

RE: Case No. 04-25 - Catholic U Campus Plan Amendments

Gentlepersons:

The Catholic University of America recently requested Zoning Commission approval of proposed changes to its campus plan relating to its newly acquired "West Campus" (Case No. 04-25). Catholic U proposes to amend its campus plan to add the 49 acres acquired from the Soldiers' Home to its existing 144-acre campus and zone the land. The Michigan Park Citizens Association hereby requests party status. Entities such as the bakery, food bank, and cable television franchise enumerated in the case file lie within the Michigan Park Citizens Association area which abuts the campus; Exhibit 2A (aerial photograph) shows residences of citizens association members and officers. I and/or members of Michigan Park's task force on university impacts—Dino Drudi, Gwendolyn B Means, and/or David Conrad—might appear on behalf of the Association in opposition to Catholic U's proposed campus plan.

More importantly, provision of ample, adequate, affordable on-campus housing for juniors and seniors wishing to live on campus is imperative to preserve the character of the neighborhood by protecting it from being overwhelmed by well documented, foreseeable impacts were such students forced off campus by university failure to provide ample, adequate, affordable on-campus housing. The campus plan revision acknowledges the housing surplus in 2003 when the campus plan was approved no longer exists. Accordingly, any campus plan such as this that merely proposes playing a shell game of turnaround space while

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dorms are renovated or permanently closed is patently inadequate from a community perspective.

Catholic U historically is primarily a graduate institution, but enrollment data contained in its plan show that undergraduates comprise a growing share—now a majority—of its FTE. The following table containing data from the campus plan documents the growth of total and undergraduate versus graduate student enrollment. This growth merits *de novo* review of the Catholic U campus plan because the University is making a major change in its *modus operandi*. Were these extra undergraduate students pushed out into the community, we believe those who would opt to live on campus were ample, adequate, affordable on-campus housing available are more likely to move into the Michigan Park community. Problems associated with student housing in Michigan Park and other parts of the city and country are well documented.

	Enrollment (FTE)		
	Graduate	Undergraduate	Total
1981-82	2,847	2,822	5,669
1991-92	2,411	2,770	5,181
2001-02	1,906	2,451	4,357
2004-05	1,968	2,742	4,710
2011-12/proj	2,847	3,319	6,166

The Michigan Park Citizens Association believes this transition to a primarily undergraduate university to be a sufficiently significant development that, coupled with the 34% increase in the University's size resulting from acquiring the west campus site, should prompt the Zoning Commission to reopen the entire campus plan for *de novo* review.

As the accompanying article in the Catholic U student newspaper shows, Catholic U's motivation is to take this land off the tax rolls. Catholic U caters primarily to students from outside the city and metropolitan area, minimizing its benefits to local residents. Too much city land already is off the tax rolls, such that, were the Zoning Commission to allow this land to also be taken off the tax rolls it should derive in return some compelling public benefit which the Association, respectfully, recommends be writing an explicit commitment into Catholic U's campus plan to provide ample, adequate, affordable housing for all its juniors and seniors who wish to reside on campus (in addition to its current requirement virtually all freshman and sophomores live on campus), so they are

not forced to move into the surrounding neighborhood with the well-known impacts such an influx would foreseeably entail.

The Association anticipates Catholic U's plans would turn the site into an eyesore and nuisance "shantytown" trailer park near Harewood Road on the recently acquired land. Catholic U should put dorms on the site instead of more trailers or (more likely) just moving the trailers now in the center of campus where they are an eyesore only to the campus community but not the general public. But, more importantly, a trailer park in an area near Harewood Road on the recently acquired land poses real student safety and environmental concerns. Firstly, under the Catholic U's proposal, this location would continue to be isolated, making it an opportunity for the criminal element to prey on the vulnerable students and the isolated trailers. The need to cross Harewood Road adds traffic hazards since there are no intersections governed by traffic signals on Harewood Road between Michigan Avenue and Taylor Street and adding one mid-block would impede the flow of traffic. Moreover, each trailer would require separate water and sewer hook-ups raising environmental concerns. As temporary buildings, trailers might also have a greater tendency to contribute to run-off/soil erosion.

Catholic U also wants to put a trash "recycling" facility on the site, turning it into a trash transfer site of which the city has already too many. As with the trailer park, it appears Catholic U wants to move its eyesores off campus where the campus community would no longer have to look at them, but the rest of us would have to bear the brunt of trash being ferried across public streets that now is not. In response to reductions in the city's tree coverage, considered drastic, the city enacted burdensome regulations on homeowners against cutting down trees 55" or more around. In order to build the anticipated amenities on this site, Catholic U would apparently have to cut down large trees. Whatever the merits of imposing such regulation on homeowners, no special exception, such as this campus plan, should be allowed which results in loss of the city's scarce tree cover which mitigates the effect of heat and pollution that does not contain substantially more public benefits than Catholic U proposes.

Lastly, the Michigan Park Citizens Association has no objection to zoning the land R-5-A as Catholic U proposes. Nevertheless, the Association is concerned that even under this zoning, buildings 90' high would be permitted. The

Association believes a limitation of 40' would be more in keeping with the campus' character.

Respectfully submitted,

Roxanne Carter

Roxanne Carter, President

Enclosure

CASE 04-25

EXHIBIT 13

HAS OVERSIZED DOCUMENT

SEE FILE AT ZONING COMMISSION