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November 14, 2005

Paul Tummonds
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Ms Sharon Schellin
Secretary to the Zoning Commission
441 4th Street, Room 210
Washington, DC 20001

Re: Z.C. Case No. 05-31 - Georgetown University Special Exception Application for Further Processing of an Approved Campus Plan
Pre-Hearing Statement of the Applicant

Dear Ms Schellin

Enclosed please find the pre-hearing statement of Georgetown University (**"Applicant"**) for construction of the proposed Multi-Sports Facility and a new McDonough School of Business, as well as the resume of Louis J Slade, Applicant's expert engineer This case is scheduled for a public hearing on Monday, November 28, 2005

If you have any questions, please do not hesitate to contact the undersigned

Sincerely yours,

Paul A. Tummonds, Jr

Enclosures

cc Edward Solomon, ANC 2E (by hand delivery)
Office of Planning (by hand delivery)
Abdoulaye Bah, DDOT (by hand delivery)

ZONING COMMISSION
District of Columbia
CASE NO. 05-31
EXHIBIT NO. 17

ZONING COMMISSION
District of Columbia
CASE NO.05-31
EXHIBIT NO.17

BEFORE THE ZONING COMMISSION
OF THE DISTRICT OF COLUMBIA

Application of Georgetown University	**Z.C. Case No. 05-31** **ANC 2E**
Campus Plan Further Processing Application For Construction of a new McDonough School Of Business Facility and a new Multi-Sports Facility	**Public Hearing: November 28, 2005**

PREHEARING STATEMENT OF THE APPLICANT

I. Nature of Relief Sought

Pursuant to 11 DCMR §3104 and in accordance with §210 of the Zoning Regulations, Georgetown University (hereinafter **"Georgetown"** or **"Applicant"**) requests special exception approval for the further processing of an approved Campus Plan to permit the construction of a new McDonough School of Business facility (**"MSB"**) and a new Multi-Sports Facility (**"MSF"**) Both of these projects will be located on the mid-campus portion of the Georgetown campus. No variances are requested in this application, and the requested special exception relief fully meets the requirements of the Zoning Regulations

II. History and Status of the Campus Plan

Georgetown submitted its proposed Campus Plan for the period 2000 through 2010 (the **"Campus Plan"**) to the Board of Zoning Adjustment (**"BZA"** or **"Board"**) on January 31, 2000 The Campus Plan was approved subject to conditions and was subsequently appealed by Georgetown to the D.C Court of Appeals. The Court of Appeals determined that certain conditions, including conditions relating to a freeze in student enrollment and student behavior off-campus, were not supported by substantial

evidence in the record and/or exceeded the authority of the Board. Accordingly, the Court vacated the order and remanded it to the BZA for further proceedings. On June 7, 2005, the Board issued a Corrected Order on Remand (BZA Order No. 16566-F) approving the Campus Plan until December 31, 2010. In accordance with the requirements of that Order, Georgetown submitted a Campus Plan document to the BZA and all parties on July 20, 2005.

Upon the request of the BZA, Georgetown submitted an updated Campus Plan document on October 4, 2005, which included an enhanced description of the current Off-Campus Student Affairs program and the Alliance for Local Living ("**ALL**") neighborhood council. On October 18, 2005, the BZA certified the Campus Plan document submitted by Georgetown on October 4, 2005 as the approved Campus Plan.

III. Requested Special Exception

A Construction of McDonough School of Business Facility

Georgetown proposes to construct the MSB on the mid-campus portion of the Georgetown Campus, as shown on the site plan included in Exhibit A. The MSB will include five stories, approximately 171,057 square feet of gross floor area, and two levels of below-grade parking including approximately 194 parking spaces[1]

The MSB facility will provide the physical infrastructure to support the mission and goals of Georgetown by housing all business programs, teaching, staff, classroom, and informal meeting facilities within a single building The building design includes a

[1] Georgetown does not seek an increase of the on-campus parking space cap of 4,080 spaces The approximately 194 parking spaces included in the MSB building will replace spaces that are currently scattered throughout the mid and southern portions of the Campus on surface parking lots

four story central atrium that provides a visual and functional link to all program areas of the facility. Three wings of the building are enclosed by an elliptical, four story volume on the east to form the building's footprint. The MSB will form the western half of a new academic quadrangle that will be completed with the construction of a new Science Center at some point in the future.

The MSB's massing, materials and detailing help integrate the building into the fabric of the historic campus core. The building exterior will include masonry (field stone, brick, and cast stone) walls with aluminum windows and slate and metal clad roofs. The architectural details of this building will be similar in character to other buildings on campus such as Copley and White-Gravenor Halls. The area surrounding the MSB building will include landscaping and brick, stone, asphalt and concrete hardscape features Plans, elevations, and sections of the proposed MSB building are attached as Exhibit A.

B. Construction of the Multi-Sports Facility

The proposed MSF will replace the existing temporary stands on Harbin Field. The MSF will accommodate a total seating capacity of 4,500 (2,000 in the east stands and 2,500 in the west stands) The existing Harbin Field includes approximately 3,700 seats The MSF will be used year round for practices and games for lacrosse (men's and women's teams), football (men) and soccer (men's and women's teams) The MSF will also include approximately 41,397 square feet of gross floor area that will provide locker rooms, training facilities, concessions stands, and a press box The MSF will also host special events including orientation activities and Georgetown sponsored student activities, such as movies, speakers, campus festivals, and concerts. It may also be used

for graduation The MSF will allow Georgetown to consolidate many of the activities that currently take place throughout campus in one central and more buffered location.

The proposed design of the MSF allows the field area to continue to function as a main open space for the mid-campus and reinforces the urban and pedestrian nature of the campus. Four entrances to the MSF, marked by gothic entry pavilions, are located at the north/south and east/west mid-campus walks The proportions of the pavilions, colonnade, and detailing of the MSF incorporate the Collegiate Gothic character of the campus and the surrounding campus buildings, White-Gravenor and Copley Halls. The colonnade pilasters will have brick facing with a rusticated base, precast concrete lintels, coping and Gothic arches. The railing and balcony stringers, and finials will be steel with a coated finish The perimeter fencing will be a combination of brick faced masonry post with a pre-cast concrete base and wrought iron Plans and elevations of the proposed MSF are attached as Exhibit B.

IV. JURISDICTION OF THE COMMISSION

Effective December 8, 2000, the authority to hear and decide new campus plan and further processing applications became exclusively vested in the D.C. Zoning Commission (the "**Commission**") pursuant to 11 DCMR § 3035. Each case is processed and heard under the special exception provisions of § 210 of 11 DCMR.

Uses that are permitted by special exception are presumed to be appropriate for the applicable zoning district as long as certain conditions are satisfied. In considering special exception applications, the Commission must consider only whether the relevant conditions and special exception criteria have been met. If the applicant meets its burden, the Commission ordinarily must grant the application *See First Baptist Church of*

Washington v. District of Columbia Board of Zoning Adjustment, 432 A.2d 965 (1981); *Stewart v District of Columbia Board of Zoning Adjustment,* 305 A.2d 516, 518 (1978).

In recent decisions, the D. C. Court of Appeals has reaffirmed the reviewing agency's jurisdiction and scope of review in campus plan cases and has made clear that in reaching its decision the reviewing agency may take into consideration such factors as institutional necessity *See, e g , Draude v District of Columbia Board of Zoning Adjustment,* 582 A 2d 949, 955 (1990) Further, the Court has distinguished the broader public good referenced in the Zoning Regulations from the more narrow interests of neighboring property owners.

V. Compliance With the Requirements of Section 210

In all respects, the requested special exception approval fully complies with §210 of the Zoning Regulations. The specific zoning requirements, and Georgetown's satisfaction of those requirements, are addressed in detail below.

A. College or University Which is an Academic Institution of Higher Learning (Subsection 210.1)

Georgetown University was founded as an educational institution of higher learning in 1789 and received its federal charter in 1815

B. The Use is Located so that it is Not Likely to Become Objectionable to Neighboring Property (Subsection 210.2)

No undergraduate student enrollment increase is directly related to the construction of the MSB building or the MSF The University projects a modest increase in working professionals seeking a degree part-time only at night An increase in faculty

and staff levels of approximately 3 0% is anticipated as a result of these projects. The mid-campus location of the MSF and the MSB building will help minimize any noise, lighting or visual impacts that the projects may have on neighboring properties.

In addition, the MSF is located at an elevation that is substantially lower than any neighboring properties, thus, the existing campus buildings will help buffer any noise created by this use. The University's own students will be the individuals primarily affected by any noise created by the MSF.

The University also enforces a strict noise policy which precludes outdoor activity featuring amplified sound from continuing past 11:00 p.m. on weekdays or 1:00 a.m. on weekends Georgetown monitors and responds to all pertinent complaints, which effectively reduces disruptions to neighboring properties

1. Traffic Impacts

The Applicant engaged Gorove/Slade Associates, Inc. to perform a Traffic and Parking Assessment that addresses the impact that the development of the MSB and MSF will have on the surrounding neighborhood The Traffic and Parking Assessment is attached as Exhibit D.

The Traffic and Parking Assessment notes several components of Georgetown's Transportation Management Plan ("**TMP**") that help minimize traffic and parking impacts on neighboring streets These components include the campus parking space cap of 4,080 spaces, an effective public transportation policy and the provision of bus service, and parking policies that discourage personal vehicle use – but at the same time encourage those who drive to campus to park on campus rather than neighboring streets The Traffic and Parking Assessment concludes that

> [T]he MSB and MSF will not increase vehicular traffic and will not create additional parking demand on the residential streets surrounding GU's main campus. There will be some minor change to traffic patterns internal to Georgetown University campus with the relocation of 194 parking spaces to a proposed garage to be constructed with the MSB. The change in traffic patterns will occur at off-peak times when demand on the local roadway network is not at its greatest.
> (Traffic and Parking Assessment, p iii.)

2. Events at the MSF

The MSF is expected to be ready for use in 2008 or earlier. The intensity of use of the MSF for athletic events is expected to be similar to the existing use of the athletic fields on the Georgetown Campus. Condition No 4 of the approved Campus Plan Order (BZA Order No. 16566-F) requires:

> 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 campus parking areas and to facilitate smooth flow of traffic into and out of the campus
>
> 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.
> (BZA Order No 16566-F, p 18.)

The number, days and times of athletic events for 2004 - 2005 are discussed in detail below and are fully in compliance with the requirements of Condition No. 4 discussed above

Football

In 2005, Georgetown's football team will host six home games, all of which are scheduled for Saturday afternoons

Men's Lacrosse and Soccer

This past year, the men's lacrosse team played six home games, all of which were played on weekends. The men's soccer team will play eight games at home this year, three of which will take place on the weekend. Those that will be played during the week are scheduled for early afternoon in order to eliminate any possible adverse impact on neighboring properties or on the surrounding peak hour traffic patterns

Women's Soccer and Lacrosse

The women's soccer team will host nine games this year, with over half of them taking place on the weekend. This past season, the women's lacrosse team hosted eight home games, including one tournament game While a number of the games were played on Saturdays, the women's lacrosse team also played several games on Wednesdays Typically, the women's soccer and lacrosse teams generate a maximum attendance of 500 students who are not "visitors" to the campus and thus do not create traffic or parking impacts by attending these sporting events.

Other Events

The MSF may be used for graduation, which typically takes place on the Saturday before Memorial Day weekend. The MSF will be used for other university sponsored activities for students and members of the surrounding community. These events will occur on days and at times that do not conflict with peak traffic or parking demand on neighboring streets As discussed in detail in the Traffic and Parking Assessment, an analysis of the traffic and parking impacts of Homecoming Weekend was performed to understand the "worst case scenario" of traffic and parking impacts on the surrounding neighborhood It was estimated that approximately 2,900 people attended this event and

only 5% of the attendees parked on neighboring streets. It is not anticipated that any University sponsored event held at the MSF would have a similar traffic and parking impact on the surrounding neighborhood.

Additionally, the Traffic and Parking Assessment noted that improvements to the Canal Road exit from the campus will allow left turns in and out of the campus, creating additional access capacity and reducing the impact that traffic related to special events will have on neighborhood streets. The Traffic and Parking Assessment also concludes that the increased capacity of the MSF will not change the commuter peak period impacts of the anticipated athletic events

For all of these reasons, the proposed use of the MSB and the MSF are not likely to become objectionable to neighboring property owners.

C. Compliance with the Maximum Bulk Requirements (Subsection 210.3)

Georgetown's overall FAR is 1.13, which is well below the 1.8 FAR permitted under the Zoning Regulations. The two projects will add approximately 212,448 square feet of gross floor area to the Georgetown campus The additional 212,448 square feet of gross floor area will result in an overall FAR for the campus of 1 17.

D. Submission of a Plan for Developing the Campus as a Whole (Subsection 210.4)

As noted above, Georgetown filed its 2000 – 2010 Campus Plan on January 31, 2000 The Board issued a Corrected Order on Remand (BZA Order No 16566-F) on June 7, 2005 approving the Campus Plan No amendments to the Campus Plan are proposed as a result of this special exception application The Campus Plan anticipated the construction of both of these projects

The Campus Plan notes that "the primary facility deficiencies identified on campus are the need for new academic space to meet existing needs and enhanced student life/athletic space to improve the quality of campus life". (Approved Campus Plan dated October 4, 2005, p. 16.) The proposed MSB and MSF projects address these noted deficiencies The existing business school faculty and classrooms are scattered throughout the campus As noted above, the proposed MSB building will house all graduate and executive MBA programs, and the vast majority of the undergraduate classes, in a single facility

In regard to athletic and recreational activities, the approved Campus Plan noted its support for the·

> University's athletic and student life goals of providing athletic fields and facilities of sufficient number and quality in relative proximity, to allow the athletics department to compete effectively within its sports divisions and to provide students with the opportunity for informal play. General strategies to achieve these goals are
>
> - Increase the functionality of existing and planned facilities.
> - Increase the utilization of facilities.
> - Develop facilities that support Title 9 requirements
> - Develop facilities that meet NCAA requirements.
>
> (Approved Campus Plan dated October 4, 2005, p 24.)
>
> In furtherance of those goals, the Campus Plan calls for the
>
> [r]edesign of Harbin Field into a multi-sports facility that meets NCAA regulations for football, soccer and lacrosse. The redesigned Harbin Field supports the integration of the athletics into campus life by allowing for more varsity sports to play in the center of campus
>
> (Approved Campus Plan dated October 4, 2005, p. 24.)

E. No Interim Use of Land is Proposed (Subsection 210.5)

No interim use of land is requested as a result of these special exception applications.

F. No New Use Sought for Approved Site of Buildings Moved Off Campus (Subsection 210.6)

Georgetown does not seek approval for any new use of a previously approved building site and thus complies with this section.

G. Compliance with the Policies of the District Elements of the Comprehensive Plan (Subsection 210.7)

The Project is not inconsistent with the policies of the District Elements of the Comprehensive Plan. The Project will further the goals and objectives of the Ward 2 Element of the Comprehensive Plan by enhancing educational facilities in the ward without adversely impacting adjacent residential areas.

H. The Proposed Buildings Are within the Floor Area Limit for the Campus as a Whole (Subsection 210.8)

The existing Campus Plan FAR of 1.13 is within the permitted 1.8 FAR prescribed for the residentially zoned portions of the campus. The Project will add approximately 212,448 square feet of gross floor area to the campus, which will result in a new Campus FAR of 1.17.

I. Referral to the District of Columbia Office of Planning and the District of Columbia Department of Public Works (Subsection 210.9)

Georgetown has met with representatives of the Office of Planning ("**OP**") to discuss this application and has submitted the Traffic and Parking Assessment to the District Department of Transportation ("**DDOT**")

VI. Historic Approvals and Community Dialogue Process

A. Commission of Fine Arts/Old Georgetown Board

Both the MSB and the MSF have received concept approval from the Commission of Fine Arts ("**CFA**"), which has jurisdiction over the Georgetown Campus pursuant to The Old Georgetown Act. Copies of the letters indicating the CFA's lack of objection to the projects are attached as Exhibit E.

B. Advisory Neighborhood Commission ("ANC") 2E

Georgetown presented its plans to ANC 2E at the ANC's public meeting on October 4, 2005. ANC 2E unanimously supports the proposed construction of the MSB and MSF In a resolution in support of this application, attached as Exhibit F, the ANC noted that it appreciated Georgetown's efforts to seek the ANC's comments and address any potential concerns well before the hearing date The ANC also noted that Georgetown was taking steps to avoid any noise or traffic problems that may result from the projects.

C. BZA Quarterly Meeting Group

Georgetown made a presentation to the Board of Zoning Adjustment ("**BZA**") Quarterly Meeting Group on October 20, 2005 regarding this application At this meeting, the Citizens Association of Georgetown ("**CAG**") expressed concern regarding the potential for the MSF to be used for large scale commercial events The MSF will be used solely for Georgetown sponsored events catering to Georgetown students and the

immediate neighborhood and community. As noted above, these events are not likely to result in large amounts of vehicular traffic coming to the campus.

VII. Witnesses

1. Alan Brangman, University Architect, Georgetown University
2. Todd Olson, Vice President for Student Affairs
3. Linda Greenan, Assistant Vice President for External Relations, Georgetown University
4. Louis J. Slade, Traffic and Parking Consultant, Gorove/Slade Associates, Inc.

VIII. Exhibits in support of application

Exhibit A — Plans for the proposed MSB.

Exhibit B: — Plans for the proposed Multi-Sports Facility.

Exhibit C. — Photographs of the mid-campus portion of the Georgetown Campus.

Exhibit D· — Traffic and Parking Assessment prepared by Gorove/Slade Associates, Inc

Exhibit E — Letters of no objection from the Commission of Fine Arts.

Exhibit F — Resolution in support of the application from ANC 2E

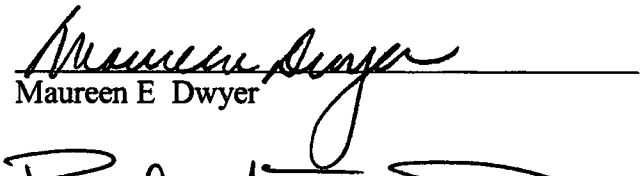
Exhibit G — Outlines of Witness Testimony

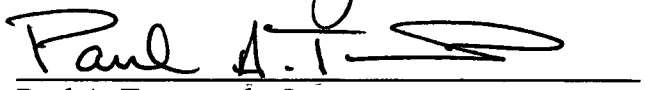
IX. Conclusion

For the reasons stated above, the proposed MSB and MSF projects satisfy the requirements for special exception approval of an approved campus plan in accordance with §210 of the Zoning Regulations. Accordingly, it is respectfully requested that the Commission approve this special exception application

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN, LLP

By 
Maureen E Dwyer


Paul A. Tummonds, Jr


Christine A Roddy♦

Land Use Counsel for the President and Directors of Georgetown College

♦ Not admitted in DC, licensed in the State of Georgia and supervised by members of the DC Bar