



**CITIZENS ASSOCIATION
of GEORGETOWN**

December 29, 2008

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D.C. OFFICE OF ZONING

2008 DEC 29 PM 2:06

Mr. Anthony Hood, Chairman
D. C. Zoning Commission
441 Fourth Street, N.W.
Washington, D. C. 20001

Dear Mr. Chairman:

Re: Z.R.R. 08-06-7 – Campus and Institutional

Like other residential communities in Washington, the Citizens Association of Georgetown has worked for years to make the best of our relationship with the major educational institution that exists in our neighborhood, Georgetown University. As the school has grown larger and larger, this has been a challenge that both GU and the community know we must address. Some of the changes proposed by the Office of Planning will aid in this effort, and others will not. Moreover, the combined impact of several other private nonprofit institutions also adds to the complexity for the residents of the National Historic Landmark that is the Old Georgetown community.

The size threshold set in Recommendation #2 is too high to provide protection for residential communities. Further, it appears that OP is recommending a change to of-right institutional use of currently residentially zoned property – as long as that institution is below some as-yet-unspecified size. No provision is offered for how many such institutions can be sited within an area or zone. We strongly oppose these provisions. All non-residential projects in R zones like Georgetown that are not required to file campus plans should abide by the special exception provisions (preferably strengthened provisions) or obtain use variances.

Recommendation #3 also refers to matter-of-right institutional operation in residential zones, effectively rezoning R-3 neighborhoods. We are firmly committed to protecting the residential nature of Historic Georgetown and could not support this change, and we know other communities share this concern.

For those institutions that already exist, we welcome fuller provision of information but note that, with the exception of the environmental category, much of what is identified as “proposed” new information is actually currently provided. The most fundamental change that is needed is a formula for counting students and employees that is constant among educational institutions: counts of actual bodies enrolled by semester, broken down to full-time undergraduates, part-time students, graduate students, residence on campus or off, summer-program participants, etc.

“Averaging” student numbers disguises impacts and should be discontinued (would anyone think it reasonable to average in the summer enrollment numbers to determine impact on the community?). The actual peak number of individual

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ZONING COMMISSION
District of Columbia
CASE NO. 08-06-7
EXHIBIT NO. 30

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students in each category should be provided for the Commission's consideration in determining the setting of caps for some groups.

Data for employees should again be bodies, not FTEs or other devices. Categories of data would not imply regulation of each subset; they would inform overall decision-making. Regulations should require the provision of this information at least once a year for all sizable institutions.

We believe that caps on student enrollment and employee levels are essential tools and should be specifically provided for, as should transportation demand management. Georgetown University managers have told us that without the current cap on parking on campus, they would be bringing significantly larger numbers of cars to campus, adding to the serious traffic problems that already exist at intersections near campus.

Recommendation #4 is problematic: it sets far too high a threshold (3,500 square feet of GFA) for required amendment of the campus plan; it makes no provision for multiple changes, each of which could fall below this threshold. More fundamentally, eliminating second-stage reviews denies communities the public process by which they can attempt to enforce compliance with the conditions of an existing campus plan without recommending a workable alternative. If OP believes an alternative enforcement mechanism would be preferable, the affected communities should be informed of what they have in mind before the Commission makes recommendations about policy.

We agree with the problems identified in Recommendation #5: the vague standard in §206 for special exception means it provides little protection for residential communities. For the 2000 GU campus plan, we believe the community presented an abundance of evidence showing that GU had greatly surpassed the "likely to become objectionable to ... nearby property" standard, and in fact *was* objectionable. Regulations should clarify the ways in which impact can be documented when "likelihood" is no longer relevant.

Recommendation #6 does not go nearly far enough. Hospitals that exist in residential communities by virtue of their affiliation with a university should be required to provide for inclusion in that university's campus plan parallel detailed information about its facilities and operations, traffic, expansion plans, numbers of patients/employees/visitors, and much more.

Ancillary campus uses need to be defined, as do activities described in the past as "academic support." Limits are not proposed for market-based activities that are not integrally part of the institutional operation (e.g., the difference between university offices and a commercial office building available for rent on the market).

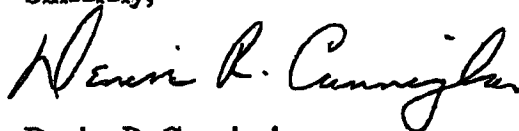
Unmentioned in the OP draft is a prohibition on PUDs being located on college or institutional campuses. We strongly oppose any effort to permit such combining of zoning schemes and would recommend a specific policy statement to that effect.

Also unmentioned is regulation of the process by which campus boundaries are established and maintained.

We welcome strengthening and clarifying the standards for reviewing institutional uses in residential zones. However, we think the proposed policy guidance misses the mark and fails to provide the clarity that would be needed for across-the-board consistency in regulating those institutional uses. We would be pleased to work with OP in strengthening recommendations.

The Citizens Association of Georgetown has, in one form or another, been representing the interests of Georgetown residents in local affairs for more than a century. The organization traces its roots to 1878, when the Georgetown Citizens Association was established as perhaps the District of Columbia's first citizens' group. We now have more than 1,200 paid members who look to us for the preservation of the qualities they value in a community that is their home.

Sincerely,

A handwritten signature in cursive script, reading "Denise R. Cunningham".

Denise R. Cunningham
President

Citizens Association of Georgetown

1365 Wisconsin Avenue Suite 200

Washington DC 20007

www.cagtown.org

To: Anthony Hood
Chair, D.C. Zoning Commission

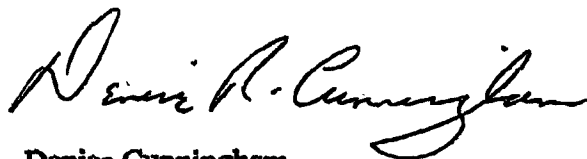
Re: Campus Plans

Date: December 29, 2008

Total Pages, including this sheet: 4

Mr. Hood;
Attached is The Citizens Association of Georgetown comments re: Z.R.R. 08-06-7-Campus and Institutional.

Thank you for your consideration.



Denise Cunningham
President

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