

CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing document were delivered by electronic mail to the following addresses on Tuesday, May 9, 2017.

ANC 2E
c/o Commissioner Joe Gibbons
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Washington, DC 20016
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MedStar Georgetown University Hospital
c/o Regina Woods, Vice President for
Government Affairs
3800 Reservoir Rd NW
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Regina.K.Woods@medstar.net

Georgetown University
c/o David Avitabile, counsel for University
Goulston & Storrs
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A handwritten signature in black ink, appearing to read "David Avitabile", is written over a horizontal line.



**BEFORE THE ZONING COMMISSION OR
BOARD OF ZONING ADJUSTMENT OF THE DISTRICT OF COLUMBIA**



FORM 140 - PARTY STATUS REQUEST

Before completing this form, please go to www.dcoz.dc.gov > IZIS > Participating in an Existing Case > Party Status Request for instructions. Print or type all information unless otherwise indicated. All information must be completely filled out.

PLEASE NOTE: YOU ARE NOT REQUIRED TO COMPLETE THIS FORM IF YOU SIMPLY WISH TO TESTIFY AT THE HEARING. COMPLETE THIS FORM ONLY IF YOU WISH TO BE A PARTY IN THIS CASE.

Pursuant to 11 DCMR Subtitle Y § 404.1 or Subtitle Z § 404.1, a request is hereby made, the details of which are as follows:

Name:	Georgetown University Student Association		
Address:	316 Leavey Center 37th and O Streets, N.W., Washington, D.C. 20057		
Phone No(s).:	202-687-3704	E-Mail:	gusa@georgetown.edu
I hereby request to appear and participate as a party in Case No.:		16-18A	
Signature:	Kamar Mack	Date:	May 8, 2017
Will you appear as a(n)	<input checked="" type="checkbox"/> Proponent	<input type="checkbox"/> Opponent	Will you appear through legal counsel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

If yes, please enter the name and address of such legal counsel.

Name:			
Address:			
Phone No(s).:		E-Mail:	

ADVANCED PARTY STATUS CONSIDERATION PURSUANT TO: Subtitle Y § 404.3/Subtitle Z § 404.3:

I hereby request advance Party Status consideration at the public meetings scheduled for: **May 22, 2017**

PARTY WITNESS INFORMATION:

On a separate piece of paper, please provide the following witness information:

1. A list of witnesses who will testify on the party's behalf;
2. A summary of the testimony of each witness;
3. An indication of which witnesses will be offered as expert witnesses, the areas of expertise in which any experts will be offered, and the resumes or qualifications of the proposed experts; and
4. The total amount of time being requested to present your case.

PARTY STATUS CRITERIA:

Please answer all of the following questions referencing why the above entity should be granted party status:

1. How will the property owned or occupied by such person, or in which the person has an interest be affected by the action requested of the Commission/Board?
2. What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)
3. What is the distance between the person's property and the property that is the subject of the application before the Commission/Board? (Preferably no farther than 200 ft.)
4. What are the environmental, economic, or social impacts that are likely to affect the person and/or the person's property if the action requested of the Commission/Board is approved or denied?
5. Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the Commission/Board is approved or denied.
6. Explain how the person's interest will be more significantly, distinctively, or uniquely affected in character or kind by the proposed zoning action than that of other persons in the general public.

Party Witness Information

1. A list of witnesses who will testify on the party's behalf

Kamar Mack, President of the Georgetown University Student Association (GUSA), will testify on the party's behalf. Kamar Mack is also the GUSA representative to the Georgetown Community Partnership (GCP).

2. A summary of the testimony of each witness

Kamar Mack will speak on behalf of Georgetown's undergraduate student body. He will address the ways in which the construction of MedStar Georgetown University Hospital's Medical/Surgical Pavilion is expected to affect student life, with particular attention to the ways that the construction management plan attempts to mitigate construction externalities such as noise on students' academic and personal well being.

3. An indication of which witnesses will be offered as expert witnesses, the areas of expertise in which any experts will be offered, and the resumes or qualifications of the proposed experts;

No witness will be offered as an expert witness.

4. The total amount of time being requested to present your case.

GUSA requests a maximum of three minutes to present its case.

Party Status Criteria

1. How will the property owned or occupied by such person, or in which the person has an interest be affected by the action requested of the Commission/Board?

All of Georgetown University's undergraduate students are eligible for on-campus housing and are required to live on-campus during their first year, sophomore year, and either junior or senior year. Because of this three-year housing requirement outlined in the 2017 Campus Plan, the majority of Georgetown University undergraduate students live on campus. As such the Construction Management Plan for MedStar Georgetown University Hospital's Medical/Surgical Pavilion directly impacts the University's undergraduate population. Given that several University residence halls and on-campus apartments are extremely close to or in some cases adjacent to the construction zones, the details of the Construction Management Plan will affect undergraduate student life and student experience. Students are most impacted by the externalities of such construction projects because noise, dust, and changes in pathways directly affect their daily living and commutes to class. In regards to noise, it is important to note that young adults and college students in particular are among the least likely demographic to get adequate sleep. Noise that is too loud or too early exacerbates this issue. In regards to dust, many undergraduate students travel away from their hometown to attend Georgetown making them more likely to experience allergies, and high levels of dust reinforce this problem. Lastly, changes in pathways are significant because they potentially add time to students' commutes or affect the accessibility of buildings.

2. What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)

The Georgetown University Student Association represents the entire undergraduate student population. University undergraduates are exclusive tenants of the university's residential spaces on campus, with the exception of a few university staff and faculty members. Furthermore, undergraduate academic programs are reserved for the University's main campus. The undergraduate students are tenants, scholars, recipients of various University services, and organizers of and participants in campus activities.

3. What is the distance between the person's property and the property that is the subject of the application before the Commission/Board? (Preferably no farther than 200 ft.)

The Georgetown University Student Association is filing this application on behalf of the undergraduate student body. Most undergraduate students live on campus or within the boundaries of Georgetown University, given that undergraduate students are required to live on campus for three academic years. The proposed Construction Management Plan aims to outline guiding principles by which the Trammell Crow Company will mitigate the negative externalities of their construction project such as noise, dust, and vermin. And while we expect the construction to affect all Georgetown students, its impact will be felt most directly by the roughly 1300 students whose dorms or university apartments lie within a distance such that the proposed construction site will be clearly audible at all times when workers are present.

4. What are the environmental, economic, or social impacts that are likely to affect the person and/or the person's property if the action requested of the Commission/Board is approved or denied?

The 2017 Campus Plan outlines the University and community's commitment to enhance the quality of its on-campus residential experience in order to encourage more students to live on campus and engage in on-campus social activity. As a result all new construction projects directly affect the student living experience because the noise and pollution associated with construction greatly impacts this residential experience. In addition attention to accessibility will be important, as rerouting on campus due to construction will especially impact students with disabilities.

5. Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the Commission/Board is approved or denied.

The last relevant matter that demonstrates how students will be affected by the construction management plan is in regards to sleeping habits. It is important to note that sleeping patterns of undergraduate students often differ from those of working professionals in that students tend to stay awake later at night in order to complete coursework, subsequently causing them to wake up later in the morning. As such, starting times and levels of noise are among the chief concerns of undergraduate students in the Construction Management Plan, and during each construction project on campus, or in the vicinity of campus, GUSA receives statements of discontent from its constituents about these concerns. GUSA through its representation in the Georgetown Community Partnership has been able to engage in thoughtful dialogue with representatives of Trammell Crow Company and articulated all of these undergraduate student concerns.