GOVERNMENT OF THE DISTRICT OF COLUMBIA

Advisory Neighborhood Commission 2E

Representing the communities of Burleith, Georgetown and Hillandale

ANC 2E Supplemental Submission for the D.C. Zoning Commission

Z.C. Case No. 10-32

Georgetown University 2010-2020 Campus Plan

November 8, 2011

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GU's Campus Plan, as Amended, Still Does Not Adequately Address the Objectionable Conditions in the Neighboring Community

ANC 2E agrees with the comments submitted by the Citizens Association of Georgetown (CAG) and the Burleith Citizens Association (BCA) on November 8, 2011 in response to GU's rebuttal materials and new initiatives.

The overwhelming objectionable impact of the University's proposed plan on the neighboring community is that it would keep in place a very large number of off-campus transient student group houses and all the problems they bring.

GU's grudging, small-scale responses to community concerns throughout this case have been disappointing. Instead of responding meaningfully to Chairman Hood's suggestion to the University that it propose truly new, large, and effective approaches to the neighborhood issues, GU has instead come back with small-scale tweaks to existing off campus student programs.

ANC 2E, the Office of Planning, key District Council members, and the adjacent communities have presented compelling evidence that the objectionable impacts from so many GU undergraduates forced to live off campus in the community go far beyond what even the most rigorous off-campus policies and enforcement could control. And GU's policies and enforcement are far from rigorous. For a summary of some key impacts, see the Office of Planning submission dated May 5; Section A of the CAG-BCA submission dated November 8; and the ANC 2E testimony of May 16.

Faced with this, GU has come back with no commitment to additional on-campus or satellite housing beyond the token number of beds conditionally offered in its March 31 filing. Instead, GU offers essentially more of the same policies and practices that have failed for the past 20 years.

Conduct and Discipline

- GU has not made any significant changes in its Code of Student Conduct or its ineffective disciplinary sanctions.

  For example, GU still declines to follow the lead of George Washington University in providing explicitly that if noise can be heard outside of a student residence, that will be considered unacceptable.

- GU reserves the right to modify any and all of its student conduct measures at any time. (GU's proposed Campus Plan dated December 30, 2010, sec. 3.3, p. 14.) And GU certainly cannot expect us to believe that any 11th-hour clamp-down it may have attempted over the past several months – in the spotlight of an impending Zoning Commission decision – will or could be sustained by GU over the long run.

- It is important to bear in mind that on the subject of university codes of conduct and disciplinary practices, we (the community and the Zoning Commission) are essentially stuck with what GU offers us. The Court of Appeals has made clear that the Zoning Commission cannot order changes to a university's disciplinary standards and systems (President and Directors of Georgetown College v. D.C. Board of Zoning Adjustment, 837 A.2d 58, 77 (D.C. 2003)).

- The University's approach in the 2010-2020 campus plan, unhelpfully, is to stick with a system that has proven to be ineffective. This is all the more reason why an effective remedy in this case must be to tie the undergraduate enrollment cap to the number of undergraduate beds provided by the University. That is a remedy which is clearly within the Zoning Commission's powers.

- GU said in its June 15, 2011 rebuttal submission (at Tab A, p. 1) that it "hopes" to hire several additional MPD officers. Even if it could do so, keeping so many students orderly and quiet at night (many of whom have been drinking) over so large a community area is a task well beyond the practical ability of a few more officers.

  It is also far from clear that MPD can consistently make such officers available: MPD had difficulty supplying even 3 officers to GU some nights before this tweak went into effect, and patrol cars in the MPD Second District have been so scarce that at times when 3 officers were supplied, they had to share one patrol car. In addition, the officers who have been hired in the short time this tweak has been in effect are often unfamiliar with Georgetown or Burleith.

  Moreover, the officers know they are sponsored and paid by GU, an institution that has demonstrated a disturbing lack of enthusiasm for effective MPD enforcement against student misconduct and noise.

- First-hand observation and surveys of residents, attached in Attachment A, show that <u>the few additional MPD officers hired by GU and GU's other tweaks have not been effective in mitigating the objectionable off-campus student noise and conduct.</u>

First-hand late-night observations by ANC 2E Commissioner Jeffrey Jones, whose district includes the area closest to the University's main gate at 37th and O Streets NW, show that the continual noise, disruption and vandalism from late-night off-campus student activities have not been abated by the University's new efforts over the last several months. Commissioner Jones and other nearby residents report that the problems are still severe.

ANC 2E Commissioners Ed Solomon, whose district includes Burleith, and Ron Lewis, whose district includes the northwest area of West Georgetown, report similar experiences and observations (see Attachment A).

- The same is true of the trash truck GU has begun sending around the community: the trash truck has been ineffective in mitigating the visible trash that comes from far too many of the off-campus student houses.

  By the University's own count, as GU has informed ANC 2E commissioners, a trash truck it sends around the student-centric areas of the community daily at 10:00 a.m. and 2:00 p.m. has been picking up over one and a half tons of trash every day. The trash is picked up from visible places mainly around the student houses.

  We have been saying for years that areas around student group houses are often strewn with trash. The University, after years of turning a blind eye, has belatedly taken some remedial action. But the University does not seem to appreciate that during the 20 or so hours every day when the GU trash truck is not picking up the trash, another 1.5 tons of trash is dumped outside for all in the community to experience. The trash truck proves beyond a doubt the existence of a serious problem. It clearly does not sufficiently mitigate, let alone solve, the problem. In an odd way, it may even exacerbate the undisciplined seven-days-a-week strewing of GU-related trash in the community.

  Recent photos of the continuing trash problem are attached in Attachment B.

- The third element put forward by the University is its new weekend late-night shuttle between GU and the M Street business and bar area in Georgetown. This is a marginally helpful step, and one we have asked GU to do for years – though we have asked for a more frequent and convenient service than what GU has decided to provide. The M Street shuttle, running between the business area and the campus, is, however, only of marginal value as long as so many undergraduates live off campus. The 400 or 500 students it shuttles on a weekend night are dwarfed by the large number of GU's 6,000

undergraduates who continue to travel on foot noisily and disruptively through our entire community in West Georgetown and Burleith during the same late-night hours, to and from the group houses as well as on foot to and from campus, often impaired by alcohol. We have not experienced a decrease in the noise and disruption from the late-night student foot traffic in the community since GU's bus service has been implemented.

> We note also that GU does not propose to stop running its separate late-night shuttle van through the residential streets – which CAG, BCA and ANC 2E have requested be ended because of its disruptive effects. The noise from groups of late-night partying students getting on and off this van in the residential neighborhoods, or waiting for the van while socializing loudly on a residential sidewalk, continues to be objectionable.

- Similarly, GU continues to propose only minor tinkering with other practices and policies that have proven to be ineffective, including SNAP and "education" efforts. SNAP's lack of effectiveness has been thoroughly demonstrated by the evidence submitted by witnesses in opposition in this case. And GU cannot realistically "educate" its off-campus students to, for example, go to bed earlier, or not speak in groups or on cell phones at two or three a.m. so that neighbors hear it from the sidewalk or from the house next door through the town-house walls. GU has been saying for years that it will "educate" its undergraduates about off-campus living, and it has not worked.

- GU's latest "landlord initiative" resembles sporadic past initiatives of working with DCRA and landlords to see that rental group houses are inspected and have basic business licenses. GU's proposed "good" housing list is little different from what the University has done in the past, in that there are no teeth – GU continues to allow its students to live in any off-campus housing they choose, whether the housing is substandard or not. We observe also that if GU were serious about ensuring that off-campus student group houses have basic business licenses, the University would not continue to rent out, as it does, numerous University-owned houses that do not have basic business licenses or the accompanying safety inspections from DCRA. DCRA has advised us that the University, like any other owner of off-campus rental group houses, is subject to the basic business license requirement. The University, however, has failed to comply. All but 2 of 37 off-campus rental houses in the community owned by GU do not have a basic business license. A list of University-owned rental houses that public records show do not have this license is included in Attachment C. In any event, GU encouraging but not requiring landlords to obtain a basic business license, while possibly increasing a house's safety, will not mitigate the objectionable conditions in the community posed by so many student group houses.

- Much of GU's response is either unworkably vague (e.g., GU will "continue to explore" things, with no commitment; see the third page of Tab A in GU's June 15 filing) or descriptive of steps that have been in place already – and have not worked (e.g., "impose increasingly serious sanctions for violations of the Code of Student Conduct" which GU says has been in place for some time – and which has not been effective; see the third page of Tab A in GU's June 15 filing).

- An editorial in the "Current" newspaper, which covers the community extensively and understands the issues, has said it very well:

> "Neighbors say all of the other efforts [the extra MPD officers, trash truck and M Street shuttle] . . . amount to a Band-Aid without additional on-campus beds. We tend to agree.
>
> Students will always have reason to utilize the neighborhood, but their late-night noise and other disruptions can only be truly minimized by moving the bulk of their activity onto campus."
>
> (The "Current" editorial in its entirety is in Attachment C.)

Community Engagement

GU's offer of a "Community Council" (Tab C in GU's June 15 filing) resembles a failed experiment that has already been tried. For the better part of the two years before GU filed its proposed 2010-2020 campus plan, community leaders from the ANC, the Citizens Association of Georgetown, and the Burleith Citizens Association met regularly with GU officials for closed-door, off-the-record sessions on issues of current concern. ANC members had suggested these meetings as a way of addressing issues of concern. The atmosphere was businesslike and the discussions proceeded in an orderly manner. But the University was largely unresponsive to community concerns – even when senior University officials were participants. There is no reason to believe a more junior group of University employees, as proposed by GU for its "Community Council," would be any more responsive in the future.

The fact is that except for once every decade, when the need for a new campus-plan case requires GU's attention, the University has regularly declined to do other than what it has already specifically agreed to or is required to do in a campus plan.

Since the last Zoning Commission hearing in this case, there has been one meeting of the group the University has dubbed the "Community Council." At our request, two GU officials at the

vice-president level were present as well as the lower-level GU employees proposed by the University, together with ANC, CAG and BCA representatives. Don Edwards moderated the discussion admirably, with his usual skill and finesse. But the University remained highly resistant to having on the agenda anything other than its hired MPD officers, its trash truck, and the M Street shuttle. We were left with the impression that the University regarded the limited-focus "Community Council" as largely a PR effort on its part and a diversion of attention from the more serious issues.

So while we always welcome the opportunity for constructive engagement, and we appreciate the role of the Justice and Sustainability firm and like and appreciate Don Edwards' talents very much, the fact is that GU's proposed "Community Council" is yet another more-of-the-same response by GU to a much larger problem. If it were coupled with housing the University's undergraduates in University housing as OP and the other parties have proposed, a Community Council with a broad agenda could, if the University genuinely cooperated, serve a useful role. But by itself, with some 1,300 or more traditional undergraduates still living off campus in the community (and at least as many nontraditional undergraduates and graduate students also living off campus in Zip Code 20007) and the University's attitude frozen, the "Community Council" is simply another variant of GU's same-old, same-old approach.

GU's Rules for On-Campus vs. Off-Campus Partying Encourage Off-Campus Partying

ANC 2E presented a side-by-side comparison at the May 16 hearing between GU's strict on-campus partying rules and its lax off-campus partying rules (ANC 2E Presentation, May 2011, Slide Number 19). GU's June 15 response is telling (Tab E in GU's June 15 filing). For all its verbiage, the GU response confirms the accuracy of the ANC 2E presentation.

Point-by-point:

- *Under GU's rules, weekday on-campus parties must end by midnight*. GU's response does not (and cannot) dispute that there is no such rule for off-campus parties. Instead, GU can only point to SNAP and MPD, an approach that puts all of the burden on the neighbors, does not work effectively, and certainly does not close down parties at midnight.

- *Under GU's rules, weekend on-campus parties must end by 2:00 a.m.* GU's response does not (and cannot) state that there is a similar rule for off-campus parties. Instead, GU says SNAP closes down off-campus weekend parties "after" 2:00 a.m. But in fact, there is no automatic shut-down at 2:00 a.m. or any other time for off-campus parties, and the University does not even have a list of where the off-campus parties are. It puts the entire burden on the residents to endure, and complain about, the noise.

- *GU does not dispute that there is no "two coherent hosts" rule for off-campus parties*, as there is for on-campus parties. Instead, it says it will "hold students accountable" – a rare occurrence.

- *GU does not dispute that there is no capacity limitation for off-campus parties*, as there is for on-campus parties, and again it falls back on mentioning SNAP and MPD.

- *GU does not dispute that it has no rule prohibiting serving underage students alcoholic beverages for off-campus parties*, as it does for on-campus parties. It simply cites general D.C. law, which applies to everyone. If GU does not think a rule is needed, why does it have one for on-campus parties? Many off-campus group houses have underage students living in them – e.g., most college juniors are not yet 21 at the start of their junior year – and underage freshmen and sophomores attend parties at other students' off-campus group houses.

- *GU asserts that local laws are sufficient to cover serving intoxicated students off campus.* If that is so, GU has no explanation why the University has a rule prohibiting it for on-campus students but not for off-campus students.

- *GU has no rule against parties that spill out of the premises for off-campus parties*, as it does for on-campus parties. Again, GU simply points to SNAP and MPD.

- *Only one keg is allowed for an on-campus party.* GU does not dispute that there is no such rule for off-campus parties.

- *No glass beer bottles are allowed at on-campus parties*. GU admits there is no such rule for off-campus parties. GU says the rule relates to the "communal nature of Residence Hall living" and "safety concerns" – as though group houses are not communal living and the safety of neighbors, passers-by and off-campus partiers themselves is not important.

- *No drinking games are allowed at on-campus parties.* GU does not dispute that there is no such rule for off-campus parties, instead falling back again on the ineffective SNAP and MPD responses. If drinking games are a problem for undergraduates on campus and for on-campus neighbors, why not off campus as well?

- *Clean-up for on-campus parties must be completed by 8:00 a.m.* GU does not dispute that there is no such rule for off-campus parties. It cites more general trash policies that not only do not have an 8:00 a.m. deadline but are not adequate to deal with the problem.

- *On-campus parties must be registered with GU.* GU does not dispute that there is no such rule for off-campus parties. Instead, GU cites a "party restriction" sanction that can apply to the worst repeat offenders only after the fact and then only rarely and temporarily (there were only 22 such sanctions in the spring 2011 semester). See Tab F in GU's June 15 filing, OCSL Spring 2011 Semester Report, p. 9.

GU's on-campus partying rules are in fact much stricter than its off-campus partying rules. The disparity simply encourages off-campus partying.

Parking

GU's proposed parking rules would continue to allow off-campus undergraduates to bring cars and park them in the neighborhood. GU once again declines to adopt community-responsive parking rules such as those in place at American University that prohibit student parking on residential streets. GU's new proposal to have off-campus undergraduates register their cars with the University does not effectively address the problem – the cars will still be there.

GU does not even mention, let alone address, the problem of graduate-student cars. And its proposed parking restrictions for on-campus undergraduates simply reflect GU's current policies – on-campus undergraduates may not bring cars with them.

GU's tepid response with regard to student parking once again underscores the need for University-supplied housing for GU's undergraduates. Moving off-campus undergraduates to University-housed status would include the benefit of decreasing parking congestion, by moving such students to a category for which the University does not allow cars.

The University's own transportation study confirms that on-street parking is a serious problem, particularly near the campus. That report, even based as it is on a single day's snapshot of parking conditions, states that "on-street parking is difficult to find in the immediate area surrounding the University." (Gorove/Slade Comprehensive and Final Transportation Report, October 21, 2011, p. 92.) GU's students and the University's and Hospital's visitors and commuting employees contribute greatly to the problem, and the proposed campus plan not only fails to alleviate this, but could make it worse. See Attachment D for a further analysis.

GU's Campus Density (Students per Acre) Compares Very Unfavorably with its Peer Universities

ANC 2E has supplied for the record an analysis of the density (students per acre) of GU compared with the U.S. News & World Report 50 listed universities, including universities GU considers its peers. (ANC 2E May 2011 Submission Slide 37 and ANC 2E May 2011

Presentation Attachments Tab 5.) That information is revealing of GU's over-use of its main campus.

GU does not dispute this density material. Instead, GU's rebuttal cites density information for some other D.C. universities. But as the OP report and testimony points out clearly, GU's main campus is located in a low-density (generally R-3) neighborhood consisting uniquely of very old, narrow, fragile townhouses without horizontal or vertical buffering space; narrow streets; and historic preservation concerns. As OP pointed out:

> "Each university within D.C. is extremely different in its character. [GU is located in] a very unique neighborhood. There is very little continuous alley system. Streets are much more narrow than we see in the rest of the city. This places all services and activity right on the street. It is unique because of the intimacy [closeness and scale of the built environment]." (OP testimony, May 12.)

George Washington University, for example, is in a very dense area of high-rise apartments and commercial buildings, an area generally zoned C-1 and R-5 that is much different from the neighborhood abutting GU. American University is in an area generally zoned R-1, R-5, and C-1 that is also much different and less fragile than the neighborhood abutting GU.

The severity of GU's impacts on the surrounding communities is increased by – and must be judged with regard to – the unique nature of GU's surrounding community. The small-scale, cheek-to-jowl, fragile character of this community and the over-use GU is making of the community strongly confirm that the impact is real, substantial and highly objectionable.

<u>The Zoning Commission Is Authorized to Require the University to Obtain Prior Approval before Acquiring Further Real Estate in Zip Code 20007</u>

During the cross-examination of ANC 2E on May 16, GU's counsel suggested that an earlier Board of Zoning Adjustment (BZA) order requiring advance approval for GU to purchase additional real estate had been overturned on appeal. That is not correct. The BZA order in question was <u>not</u> overturned on appeal.

On July 11, 1974, the BZA approved Application No. 10814 ("Approval of Georgetown University Master Campus Plan"). The Order contained, among other things, condition 4, which defined the campus boundary and further stated: "the university may not acquire any property beyond this boundary for university purposes without the prior approval of the Board." (Board of Zoning Adjustment Order No. 10814 available at http://dcoz.dc.gov/orders/10814_.pdf)

Following an appeal (relating to where the boundary should be located, not the prior-approval requirement for additional purchases) and remand from the Court of Appeals to the BZA, the BZA issued a superseding order dated December 19, 1977, which did not contain the language

quoted above. However neither the BZA nor the Court of Appeals decision (365 A. 2d 372) made any mention of the language quoted above, so the implication of counsel for GU that this provision was stripped by the Court of Appeals is incorrect. It simply did not make it into the Order issued on remand.

Finally, the Zoning Commission has clear authority to require a university not to expand into an adjacent neighborhood and such a provision is included in the George Washington Campus Plan Order (BZA Order 16553) which was upheld on appeal by the Court of Appeals. *George Washington University v. DC BZA, 831 A. 2d 921 (D.C. 2003).*

Un-remedied Existing Objectionable Conditions Are Legitimate Grounds for Ordering Relief in a Campus Plan Case

Significant objectionable conditions now burdening our communities are occurring as a result of what has occurred during the past 10 years. The number of undergraduates and graduate students living off campus in the community remains very high, despite what the University projected 10 years ago. Those numbers have either gone up or remained around the same, depending on the counting methodology. The group house situation is worse now than it was then – see, e.g., the number of current group houses in the Burleith survey – and nowhere near the 75 to 80% decrease in group houses predicted 10 years ago by the University.

The issues caused by the proliferation of off-campus student group houses have persisted, un-remedied, for the past 10 years. In numerous ways, the situation has actually become worse than it was 10 years ago. For example:

- The elimination of the citywide 311 number for calls to the police for quality-of-life violations. When 311 was available for calls to the police, residents were encouraged to use it to report the noise, disruption and vandalism prevalent in the neighborhood. Now that noise, disruption and vandalism can only be reported to the police by calling 911, many residents are reluctant to call the police for these issues. There remains a strong view in the community that 911 is reserved for extreme emergencies. So more quality-of-life violations are going unreported and un-remedied.

- The widening gap between strict on-campus partying rules and lax off-campus partying rules. For example, the University's one-keg limit for on-campus but not off-campus parties has gone into effect during the past several years.

- Further deterioration of the houses used for student groups over the past 10 years. Landlords have no incentive to keep up the transient student group houses to anywhere

close to the appearance and condition of long-term rental and owned houses in the community.

- The huge growth in use by students of instant text messages and social media to notify large numbers of people immediately of the locations of parties and other gatherings. This has increased disruption with larger, faster gatherings and increased noise.

- Increased cell-phone use by students compared to 10 years ago. The sound of someone talking on a cell phone carries late at night and wakes residents up – for example, even when a single student, engaged in an animated cell-phone conversation, is standing or traveling on foot on the sidewalk by residents' bedrooms at 3:00 a.m. This happens over and over again. It is not illegal, but it is highly objectionable.

The Court of Appeals has made absolutely clear that <u>the impact of continuing objectionable conditions such as these can and should be taken into account in evaluating a future campus plan</u>. In President and Directors of Georgetown College v. D.C. Board of Zoning Adjustment, 837A.2d 58, 66 n.7 (D.C. 2003), the Court ruled:

> "Citing, *inter alia, Glenbrook Road Ass'n v. District of Columbia Board of Zoning Adjustment,* 605 A.2d 22, 34 (D.C. 1992), the University argues that the BZA's inquiry should be limited to whether the new Campus Plan would significantly increase the objectionable conditions in the neighborhood. But *Glenbrook Road* was an entirely different kind of case, in which the court was discussing the impact of a proposed new law school on the campus of American University, rather than comparing a proposed Campus Plan with its predecessor. In this case, the University's approach amounts to: 'Even if present conditions under the 1990 Campus Plan in the neighboring communities are intolerable, the Board must approve the 2000 Plan unless it is likely to make those conditions considerably worse.' We reject such a reading of the regulations as altogether unreasonable."

<u>Providing University Housing on Campus or in a Satellite Location for GU's Undergraduates is the Only Remedy that Will Mitigate GU's Objectionable Impacts on the Community</u>

Extensive testimony and materials on file in this case demonstrate that the only remedy that will be effective in dealing with the severe objectionable impacts of the off-campus transient student group houses is for GU to provide housing for its undergraduates.

Nothing in GU's rebuttal materials alters this fundamental fact.

The CAG-BCA filing dated November 8 discusses the University's rebuttal materials in some detail. We simply note here that:

- The proposed conditions in the OP report, which we endorse, would not require the University to acquire, construct, remodel, or rent additional student housing if it does not want to do so. If GU chooses not to provide more housing, the undergraduate enrollment cap would simply phase down so that the cap would equal the number of existing beds. That would be the University's choice.

- Faced with that choice, the University could re-evaluate its posturing about the feasibility of various potential sites on or off campus (in Tab S of GU's June 15 filing) and provide additional beds if it wished to do so. That is in fact what it did when it offered the additional 250 beds in its March 31 Prehearing Statement – after adamantly denying to the community that any such beds were feasible.

- The University could, if it wished to do so, examine more closely additional sites for student beds on or off campus, including North Kehoe Field if a new hospital is not constructed there. It could examine adding stories to buildings – including its recently designed low-rise athletic training facility, which might be a taller multi-purpose facility with top floors for student housing. It could re-purpose existing buildings – e.g., the current science facilities that are to be replaced by a new science center.

- The University could, if it wished to do so, evaluate possibilities that it has not mentioned, including working with private developers willing and able to provide student housing facilities (including on-campus housing) at little or no cost to universities – a trend that has gathered considerable momentum in recent years. A more detailed description of this option by a firm expert in the field has been submitted by the Citizens Association of Georgetown and the Burleith Citizens Association in their November 8 submission.

- The University has stated in testimony before ANC 2E that it would be able to finance whatever is required in the ultimate campus plan order, despite a recent $90 million bond financing it is using for other purposes. (ANC 2E Supplemental Material filed June 2, 2011, Tab 4). And GU recently has launched a $1.5 billion capital campaign.

- The University's claim that it was unaware the community would seek on-campus beds for all of its traditional undergraduates and that GU was asked only to find a single housing site is not accurate. (See GU's June 15 filing, Tab S, footnote 1.) The University's own records confirm it was on notice from the earliest consideration of the 2010-2020 campus plan that all of GU's undergraduates should be housed on campus. GU's published minutes, for example, of a community meeting held on May 30, 2009

about what should be in a 2010-2020 GU campus plan state: "Community wants 100% on campus for undergrads." https://gushare.georgetown.edu/OfficeOfCommunications/campus_plan/20090530_CommunityMeetingNotes.pdf

- The "Magis Row" experiment – putting undergraduates in University-owned houses off-campus on a residential street – has failed and is creating overwhelmingly objectionable conditions in that neighborhood. This location should be a buffer between the residential neighborhood and the University's traditional main campus, not a major source of objectionable conditions. The University should not be allowed to house students in the "Magis Row" properties at this off-campus location.

- Finally, we note that providing beds for "100%" of GU's traditional undergraduate students will still leave large numbers of GU's students housed off-campus in our community. First, it will take several years to provide undergraduate housing and OP provides a reasonable schedule for GU to provide the required housing. Second, many of the over 700 "nontraditional" undergraduates, often quite young, would still live off-campus in the neighboring community, together with various exempted categories of traditional undergraduates such as married students and students with special needs as described in OP's testimony. Third, all of the graduate students – now numbering over 1,000 graduate students living in zip code 20007 – would likely remain. Managing those remaining students will be a substantial enough challenge for the community and the University.

Conclusion

The University had every opportunity over the past several months between the last hearing and now to re-think its position on undergraduate housing, and it failed to do so. Instead, it came back with small-scale tweaks to existing programs and an empty PR campaign. The path it is proposing is not working and it will not work over the long run.

The highly objectionable conditions affecting the community caused by the University have been demonstrated in detail in this case by the Office of Planning, our ANC, and the community parties. These conditions will remain and could even intensify under the plan proposed by the University.

We respectfully request that the Zoning Commission take the necessary and effective steps proposed by the Office of Planning, our ANC, and the community parties to provide lasting and effective remedies for these objectionable conditions.

Attachment A

Statements of ANC 2E Commissioners

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Statement of ANC 2E Commissioner Jeffrey Jones

I live in and represent the area in West Georgetown closest to the main gates of Georgetown University at 37th and O Streets NW.

Georgetown University has promised and implemented some additional measures that were to address what it calls "Quality of Life" issues within the community of West Georgetown. This was met with skepticism from neighbors, partly because the University has been making promises to residents for many years. The normal response over recent years by the University when it is notified by residents of an incident, has been "thank you for notifying, we are sorry to hear this, we will address this…." And then there is no evidence the University has actually addressed it, let alone addressed it effectively.

To examine this, it is important to set the context:

1. What the University calls "Quality of Life issues" are actually often laws and regulations that apply to all citizens. It is against the law to create severe noise disruptions, and disturbing an individual's right for quiet enjoyment and their peace. It is against the law to violate sanitation regulations. It is against the law for vandalism. Students making false claims about residency in order to obtain residential parking stickers violate the law. Residents look at these as being legal standards required of everyone; the University attempts to tone it down by calling it Quality of Life. The residents expect the law and regulations to be followed – as well as expecting a decent quality of life with regard to conduct that may not be illegal but is nevertheless highly objectionable.

2. The University is obviously doing what it is doing now with an eye on its proposed 10 year campus plan. It is implementing a few measures (that do not work – see below) and also strongly initiating PR efforts. As an example, GU President DeGioia sent an email blast last week to many Georgetown University Alumni (and thousands of current students), asking them to go online and click a link showing support of GU's proposed campus plan. The individual clicking the link can line item select if they are a neighbor in the community, even if they are not. A current student or a GU graduate living anywhere, with little or no knowledge of what is occurring in the community, can claim they are a neighbor supporting the campus plan.

3. Residents care about results. They do not care about newsletters, PR statements, email blasts, or the announcement of tweaks to programs, but simply want a peaceful, environmentally-clean community with public order and safety.

This is the basic context in which I speak with residents in asking them how the University-related issues that impact them are going. This Fall 2011, I was expecting to learn of some improving conditions, based on the University wanting to improve its image and gain approval

of its 10 year campus plan. But <u>based on my own observations and what many residents have told me, whom I have canvassed in my representative capacity, I can state unequivocally that conditions have not improved, and that in some cases have become worse</u>. Neighbors have quoted to me "This Fall is just as bad and if not worse than last year." Or , "The University is big and powerful, and they can do what they want. They can outlast neighbors, until neighbors move out of the neighborhood [I am aware of three residents that have sold their homes to leave West Georgetown recently because of the objectionable University-caused conditions]." Comments such as "SNAP is only there to protect the students and breakup parties, prior to the MPD arriving" once SNAP gets notice (as it does) that MPD has been called. Or, "I have become too tired of this, and have a noise machine, and wear earplugs when I go to bed. I do not make calls to anyone anymore." A resident described calling SNAP and being told, "What do you want us to do?"

The Magis Row situation remains as objectionable as ever. Magis Row is the marketing name of the University-owned town houses located off campus on the West side of the 1400 block of 36th Street NW. These houses are directly across the street from permanent residents – who are a mix of elderly, families with young children, working professionals, and single mothers. The noise, disruption and vandalism from students seem to have become worse here during the Fall of 2011. Unchecked parties are frequent and not always on weekends. Crowds of students treat Magis Row as an outdoor as well as indoor late-night gathering place. Vandalism has increased – for example, residents' decorative flower pots were smashed and left on the sidewalk two weekends in a row (October 29th and November 5th). Only the permanent residents' houses, not the student houses, were targeted. According to a neighbor, a University representative, typically, denied that this was done by students. This is a frequent tactic on the University's part, which they use over and over – or a variation, which is to challenge the neighbor to prove the vandalism was done by students. The neighbors and I conclude that overall, students are the cause, and it is far from unreasonable to reach this conclusion. In an area with a high concentration of both live-in and transient students, late-night student activities, and alcohol-fueled student behavior, the University's see-nothing-hear-nothing-deny-everything posture is increasingly unhelpful and objectionable. [1]

[1] The see-nothing posture was also taken by GU for years regarding trash from student houses. GU has reported that it noticed only 7 trash violations during the entire spring semester of 2011 from off campus student houses in all of Georgetown and Burleith (GU's June 15 filing, Tab F, p. 9). A DPW clean-sweep inspector, however, wrote up 230 serious trash violation notices in a much shorter period of time during that same semester, and covering generally a smaller area. See Attachment F to this submission for a fuller description. Now, of course, the University has had to admit that student trash is in fact a very serious, pervasive problem. The University's see-nothing approach to trash for so many years is currently mirrored by its similar approach to student noise, disruption and vandalism off campus – which the University continues somehow not to see much of, and to seriously underreport.

I am still waiting to hear any of my neighbors, whom I talk with all the time, to tell me they support this campus plan, and/or believe conditions have improved. The neighbors tell me just the opposite: the campus-plan measures are not working, and conditions have not improved.

A typical weekend night in my neighborhood. The night of Sept 24 and early morning of Sept 25 2011, a severe noise disturbance occurred on the 3500 block of O Street after 10pm. This is a frequent occurrence this Fall, as in previous Falls, in West Georgetown. It was coming from a student occupied rental house, with a large group of students and friends partying loudly inside and outside the property. The noise could be heard a block away in all directions.

I walked near the area to see if SNAP or others would intervene to stop the disturbance, since the University has stated numerous times they provide proactive programs to prevent just such disruptions. Plus, I wanted to witness first-hand how this process worked and this is what I saw: I observed a SNAP vehicle cruising the area, which did not stop but drove by the party a couple of times. SNAP made no proactive effort whatsoever to deal with this obviously loud party. The burden remained with the community and, as far as SNAP was concerned, would remain with the community. The MPD reimbursable officers, whom GU says are vigorously patrolling this area, were not present on the block at this time.

Eventually, I was contacted by neighbors who had called the MPD and within a couple minutes, I observed a SNAP vehicle – which obviously had been alerted to the MPD call – pull up to the party house. After a few minutes, I walked up to the SNAP representative (Matt) and asked him how the process worked. He explained he was notified of a disturbance, investigated it, broke it up and recorded the address and the name of the student(s) that lived there. He also said that he would report these name(s) to OCSL Director Ann Koester. He had no idea if the students would have any consequences and was not involved in that part of the process. I asked if he is notified of calls to 911, or by the University's Department of Public Safety, or the reimbursable MPD officers. He stated that he could receive a call advising him, and he can be the first to arrive at a scene.

The party had ceased by this time, and many obviously intoxicated students entered onto the public sidewalks and streets roaming to what would likely be other parties in the neighborhood. Approximately 15 minutes or so later, two MPD squad cars arrived. The officers got out of the cars. SNAP did not approach them, but I did. The officers asked me if I knew what the problem was. I advised them of a loud disturbance and one or more neighbors probably calling 911 asking for the MPD to break it up. They responded by stating "there is no problem here." I told them the University had finally broken up the party, and the MPD officers departed the scene taking no action.

Within 5 minutes, two more parties were beginning to start all within a half block of the first one. All during this time, there were hundreds of students and their friends traveling on foot through the community, likely going to other parties in the neighborhood or to M Street, or just standing or moving in groups slowly around the neighborhood. SNAP went directly to one party – possibly having been called, and possibly having seen me observing – and began talking with students there, and I turned the corner to observe the Magis Row area rapidly becoming a party scene. Some students were hanging around outside two GU-owned student houses in the community, and one house had a large, noisy party underway. I asked Matt for assistance at this party, and he said the students were inside, the party was registered with the University (it was a University-owned group house, for which GU requires party registration), and he did nothing. The party continued after Matt left the area.

I do not understand how the fact that a party at a GU-owned house has been "registered" has anything to do with approving an obvious violation of the noise laws and standards of objectionable behavior. A couple of neighbors joined me outside on the porch of a house across from Magis Row to sit and quietly observe what was occurring around us. Groups of students yelling, walking up and down the sidewalks and roads, some vandalizing directly in front of us by picking up construction barrels and tossing them on the sidewalk. We looked for proactive action by any of the people the University says patrol and control this area – MPD, GU's own police force, SNAP, the community advisor (who lives directly across), or the residential advisor who lives next door to the house where the party was underway. No action was being taken and the party was clearly disturbing the neighborhood. Also, by this time MPD had posted one reimbursable officer at the corner of 36th and O Street. But MPD stood by and watched the crowds of revelers pass by, and the loud Magis Row party was easily within earshot. We also noticed what appeared to be young individuals showing up at this party. It was unlikely these individuals were of drinking age.

It was now approximately midnight and one of the neighbors who was with me decided to call the MPD, since the University's resources, including the reimbursable MPD officers, were not going to do anything, and neighbors were stressed. Shortly after the neighbor called the MPD, two GU Department of Public Safety (DPS) officers showed up to the Magis Row party house on bicycles. The neighbor that called the MPD waved them over to where we were sitting. The neighbor advised that he had called the MPD and asked if that was why they were showing up. They stated, yes, they have access to receiving 911 calls. We asked what they were going to do and they responded by saying they were going to investigate and break up a party if necessary. We asked what their standard is for unacceptable noise levels as part of their investigation. They responded by stating if they could hear disturbances from at least 50 feet away (which had been going on for hours by this time). We asked if they would investigate if there was underage drinking and they said no, the student hosting the party was responsible for that. We

asked if they would investigate how many students were inside the house (there is a limit of 35 in an 800 sq foot space). They said no. From our observations, it appeared there were at least 50+ students in the house. We thanked the University police officers for the information, and then we watched them go into action.

They knocked on the door and one of the occupants opened the door a few inches and began a discussion with the two DPS officers. While this was happening, I walked to the alley in the rear of Magis Row and observed a stream of students exiting onto this alley and departing the scene (some tossing beer cups onto the ground). I walked back out front and stayed with neighbors that were across the street. More DPS officers arrived in squad cars along with SNAP. The DPS officers came back across the street to us, and we asked them what would happen next. The DPS officers stated they would report it, but one of the issues they had was the lack of consequences for the students. The DPS officers complained that without consequences these students tend to repeat many of the violations. After 30 minutes or so, all of the University enforcement officers and SNAP were gone from this location. There was no more noise coming from this property but there were still loud groups of students on the streets. Eventually, and 45 minutes after the initial call was made to 911, the MPD showed up to this address. The party had moved elsewhere and they departed.

I decided to walk with one of the neighbors down toward Wisconsin Avenue via N street. It was after 1 a.m., and the students (many in a state of inebriation) traveled in groups. The community was in general disorder. We could see near the intersection of O and Potomac one of the CAG Securitas cars and a couple younger individuals that were standing near an alley. The Securitas officer called in a few minutes later and reported that an armed robbery had just occurred from the spot we observed and he tried to pursue the robber, but lost him. I eventually walked home about 2 a.m. and fell asleep, only to have my phone ring about 3 a.m. from a very concerned neighbor. She sounded a little scared, and asked me if I knew why there were so many police, an ambulance and a group of intoxicated guys sitting on a curb in front of her house. I got out of bed and went to the scene. I was told that several young intoxicated non-students were walking through the streets and one of them physically attacked one of the reimbursable MPD officers. The individual was arrested and being taken away. This incident is likely from such high volumes of students partying throughout the neighborhood. The general disorder also creates an unsafe environment and attracts others who are looking for partying in the off-campus student community late at night.

Since GU's Fall term began in late August 2011, I have seen and heard many similar examples of objectionable conditions and I have been told of many more by my neighbors. In our neighborhood, the partying, noise and disruption are as bad as they have been in the past, or worse. The University's resources are not generally being used proactively. There is more of a

see-nothing-hear-nothing approach, unless and until a neighbor finally calls it in. And when that happens, University employees quiet down the house – if only temporarily – and the police arrive after the damage has been done so they do not report a problem. The community knows, though, that the problem has just moved to another nearby location, on the street or in another student group house.

Statement of ANC 2E Commissioner Ed Solomon

I live in and represent the Burleith community. My ANC district is from Reservoir Road NW (just north of GU) to Whitehaven Parkway and from Wisconsin Avenue on the east to the Glover-Archbold Park on the west. I also chair the ANC 2E public safety efforts and have done so for the past four years.

I am often out observing late at night and I am constantly in touch with members of the Burleith community. My neighbors and I have experienced – and we continue to experience – loud and disruptive objectionable conduct from GU students in and around student group houses and throughout our community. These conditions continue despite GU's new initiatives including any increase in reimbursable MPD or increased SNAP presence.

A neighbor sent me this email this fall at 3:13 a.m. on October 23rd:

> "I can't bring myself to call you at this hour, but [address – a known student group house] are at it again. They have the fire basket going and are out there around it drinking and talking loudly."

This neighbor is now seriously considering moving due to the repeated misconduct of GU's student group houses surrounding her home.

The objectionable impact includes both parties and outdoor noise as students move in groups through Burleith very late at night. Large groups of students still consistently make disruptions of late-night noise and commotion traveling through the neighborhood on their way to or from parties. If you are in a car you might not hear the noise from these parties, but once you park your car, you can hear the noise in most parts of the neighborhood.

Another example of GU's student misconduct happened most recently in October. Neighbors along the 3700 block of T Street NW experienced the following (from a neighbor's email):

> "Yelling, screaming, and repetitive foul language from a student house escalated into a fight in the front yard. One male student (wearing only underwear) was thrown or punched to the ground. A neighbor called 911. 3 MPD cars, 2 SNAP cars, and an ambulance arrived. The student on the ground was taken away by ambulance. According to the Georgetown Current the incident led to 'assault with a dangerous weapon' charges."

Based on extensive past experience over the years as well as recent experience, neither my neighbors nor I believe that the University can or will keep things quiet over the long run. The Burleith community and I have heard rosy predictions about this before from the University, and it never has worked.

Statement of ANC 2E Commissioner Ron Lewis

I live in and represent the northwestern area of Georgetown, from Volta Place NW at the south to R Street NW at the north. We have the same types of issues with student group houses in this area as Commissioners Jones and Solomon have described for the area of West Georgetown nearest the University and for Burleith, though we have somewhat fewer student group houses in the area I represent than in either of those areas.

What we do have in abundance is roving late-night student noise. Reservoir Road and Q Street NW, in particular, are often major routes for noisy late-night student foot traffic, as are the north-south streets in this area, particularly 34th and 35th Streets NW.

I talk with and hear from my neighbors very frequently, and their observations on this subject are the same as mine. The loud and disruptive late-night student behavior has continued this fall at the same objectionable levels as in the past. We hear it on many nights, and especially each weekend, and it wakes us up repeatedly. For the reasons I gave in my testimony in May, it is impossible to report this kind of moving noise and expect any constructive response.

I have seen no evidence that GU's additional reimbursable MPD officers are active or effective in addressing this noise in the area I represent.

Attachment B

Four photographs follow of continuing trash problems at student group houses in Georgetown, including group houses owned by Georgetown University.

Page 27: 3513 O Street NW, taken November 5, 2011. Note the volume of trash and the fact that November 5 was a Saturday, which is not a permissible day for leaving out trash in Georgetown. There are two violations – open trash not in a closed container; and trash on public space on an impermissible day.

Page 28: Magis Row, 1400 block of 36th Street NW, taken November 7, 2011. Again there are two violations: trash not in a closed container, and trash on public space on an impermissible day. These properties are owned by GU.

Page 29: 3301 Prospect St NW. The picture at the top, the aftermath of a party at this student group house, was taken May 1, 2011 and was included in the ANC 2E presentation in May and identified by address in the ANC 2E supplemental material filed on June 2, 2011. The picture at the bottom, showing trash is still being strewn in the yard of this student group house, was taken October 13, 2011.

Page 30: 3531 O Street NW, taken November 6, 2011. This picture shows what happens after a trash pick-up at a student group house. The trash cans in varying condition are left in the sidewalk on public space in front of the house, every day. This is a violation of DPW trash rules.

[See separate attachment for photos]

[See separate attachment for photos]

[See separate attachment for photos]

[See separate attachment for photos]

Attachment C

The following two pages show which of 37 off campus rental student group houses owned by Georgetown University do or do not have a Basic Business License from the D.C. Department of Consumer and Regulatory Affairs.

[See separate attachment for list of properties]

[See separate attachment for list of properties]

Attachment D

Editorial in the "Current" newspaper September 28, 2011

[See separate attachment for the editorial]

Attachment E

Information provided by the University's transportation consultant shows that under the University's proposed campus plan, parking availability would not improve and could worsen.

The University's Comprehensive and Final Transportation Report (the Gorove/Slade report, October 21, 2011) confirms that parking conditions are very congested in areas close to the University (pages 91-96). The University's proposed campus plan, by proposing increases in graduate students (1,967 additional graduate students proposed to replace 1,000 school of continuing study students) and increases in University and Hospital employees, even without taking into account possible increases in Hospital visitors (90 percent of whom drive, according to the Gorove/Slade report), is likely to result in increased parking congestion or at the least no alleviation of current parking congestion. By contrast, the enrollment limits and University-provided undergraduate housing proposed by the Office of Planning and the community could reduce the number of University-related cars parking on these neighborhood streets.

The calculations supporting this conclusion, all based on numbers supplied by the University or in the Gorove/Slade report, are:

New graduate students proposed by GU:	1,967
Percent of graduate students driving alone:	21.4% (p. 13 of Gorove/Slade report)
Additional graduate student cars in the neighborhood:	**421**
New employees proposed by GU and the Hospital:	830 (GU 12/31/10 filing, Exhibit M)
Percent of employees driving alone:	41.3% (p. 13 of Gorove/Slade report)
Additional employee cars in the neighborhood:	**343**
	Total **664**
Less: School of Continuing (SCS) students moving to a satellite location	-1,000
Percent of SCS students driving	62% (GU 4/26/10 community presentation)
Subtract SCS student cars in the neighborhood:	Total **-620**

These figures show a net increase in University related cars in the neighborhood under the proposed GU campus plan. In fact that difference is understated, because there will also be a likely increase in Hospital visitors (90% of whom drive) and in University and Hospital contractors, who are not counted in the University's "employee" numbers. Also, under the OP and community recommendation, GU undergraduates who now live off-campus and are allowed

to bring cars will move into University housing, where under GU's rules they are not allowed to bring cars. So the decreased demand for parking in the neighborhood could be substantial. There are only 1,709 parking spaces in the residential areas of west Georgetown and Burleith (Gorove/Slade, p. 91), and in the areas nearest to the University, a parking space is always very difficult to find. Even a relatively small decrease in demand for parking can make a substantial difference, where parking is already so tight.

Not all of the drivers of the increase in cars will try to park on the street, but the comparison is to the existing situation, in which the same is true for current drivers. So the comparison remains valid: the GU proposal is likely to result in increased parking congestion or at the least no alleviation of existing congestion, whereas the OP recommendation – by reducing SCS students without increasing the current total enrollment and by moving undergraduates into University housing – could reduce the number of University-related cars parking on neighborhood streets.

Attachment F

Georgetown University for years has downplayed and under-reported the problem of trash in the community from GU student group houses; GU continues to do the same now for off campus student noise, disruption and vandalism.

GU's history of turning a blind eye to trash problems caused by off campus group student houses has been demonstrated vividly recently, not only by the amounts of student trash GU has now admitted, but by enforcement actions undertaken by the D.C. Department of Public Works (DPW) earlier this year.

On May 31, 2011 and June 1, 2011, Sonya B. Chance, the Lead Solid Waste Inspector, Ward 2, DPW, informed ANC 2E Commissioner Jeffrey Jones by emails (below) that since March 14, 2011, she has issued 230 Notices of Violation for serious trash violations in Georgetown and Burleith.

Commissioner Jones has been with Inspector Chance on many of the occasions when she has inspected the Georgetown and Burleith areas and confirms that virtually all of the cited violations have been for student group houses in West Georgetown and Burleith - some of which are privately owned and some of which are owned by Georgetown University.

Inspector Chance can only be in any neighborhood for an hour or two at a time, and by no means every day. The fact that she wrote up 230 serious trash violation notices in our student-impacted area in so short a time – only some 75 total days, with inspections on only some of those days – is telling. In the course of a year, that rate of citations would indicate some 1,119 trash violations serious enough to be written up by DPW.

The high number of DPW violation notices puts to shame – and puts in perspective – the University's claim that GU only noticed 7 trash violations the entire spring semester of 2011 (GU's June 15 filing, Tab F, p.9). The DPW experience is further confirmation of the serious trash violations we see in our community every day when GU is in session.

The DPW citations as well as the current admitted levels of trash from GU's off-campus students also illuminate a broader issue: they show starkly how the University consistently downplays and understates serious off-campus problems. That is what the University is doing now – downplaying and under-reporting – with regard to off-campus noise, disruption and vandalism.

Emails from DPW Inspector Sonya B. Chance

From: Chance, Sonya (DPW)
Sent: Wednesday, June 01, 2011 8:01 AM
To: Jones, Jeffrey (ANC 2E03)
Cc: Dance, Lawrence (DPW)
Subject: FW: numbers

Good morning Jeff:

Correction: I have written 230 NOV's in Georgetown/Burleigh since March 14, 2011. Also the number of NOV's in Ward 3 in comparison to Ward 2 is significantly lower. For example, I may generate an average of 12 NOV's per day in Ward 2 but I only generated 3-4 per day in Ward 3. The reason has been stated below.

-----Original Message-----
From: Chance, Sonya (DPW)
Sent: Tuesday, May 31, 2011 5:12 PM
To: Jones, Jeffrey (ANC 2E03)
Cc: Dance, Lawrence (DPW)
Subject: RE: numbers

Good afternoon Jeff:

I was re-assigned to Ward 2 on Monday, March 14, 2011. Since that date till now, I have written 130 Notice of violations in the Georgetown and Burleigh areas. (2-1/2 months) I was assigned to Ward 3 prior to that date. The number of violations in Ward 3 were of a fraction. The citizens in Ward 3 pride themselves in the greenery/foliage on their properties. There is not an abundance of sanitation violations within the residential areas in the ward. The commercial properties have some issues but are usually in compliance with most of the sanitation laws.

In comparison to Ward 2 (Georgetown/Burleigh) differs due to the varying types of residential occupancies (property owners and students who attend the university). Most of the property owners, those who resides in their property, are very prideful of their community, although there are issues with the way they dispose of their trash. I have found that either they do not know the sanitation laws on trashbags/trashcans or are disregarding them. The majority of violations on those properties are due to their trash disposal. They tend to place their trash out for collection in uncontainerized bags, which are attractions for rodents. Also, if there are trashcans, some do not have the lids securely tightened.

The students are not informed by their landlords of the sanitation laws in DC, resulting in them disposing their trash incorrectly or not placing their trash out for collection at all. Although the landlords are educated on our trash laws, they are not maintaining their properties. Any violations that are a result of the students' ignorance of the laws are issued to the property owner. It is up to the property owner to have the student (or their parent) pay the fine. The students are not held accountable by the university nor the property owners. The university must

communicate with the city, the community and its property owners when there will be a "move out" occurring. This blight to the community can be prevented with everyone's cooperation.

Thank You,
Sonya B. Chance
Lead Solid Waste Inspector, Ward 2
Department of Public Works
Solid Waste Education & Enforcement Program
2/645-7190

From: Jones, Jeffrey (ANC 2E03)
Sent: Thursday, May 26, 2011 4:24 PM
To: Chance, Sonya (DPW)
Subject: numbers

Hi Sonya,

Any chance you can give me how many citations you have issued since you have been working in Georgetown and Burleith? Any idea, how that number compares to previous locations you have worked in? If there are much more in West Georgetown and Burleith, can you possibly tell me why that may be so?

Thanks,

Jeff Jones
ANC2e
http://www.anc2e.com/
240-674-3946

Preventing terrorism is everybody's business.
If you SEE something, SAY something.
Call the Metropolitan Police Department at (202) 727-9099 or email at SAR@DC.GOV to report suspicious activity or behavior that has already occurred.
Call 911 to report in-progress threats or emergencies.

To learn more, visit http://www.mpdc.dc.gov/operationtipp.

MIXED G

INTEX

353
1
3529

GU owned townhouses outside campus boundaries

Source: D.C. Department of Consumer and Regulatory Affairs public records

BBL- NO, indicates no Basic Business License

SQUARE LOT	ADDRESS	NAME OF PROPERTY OWNER	BBL
1248 0837	1408 36TH ST NW	GEORGETOWN UNIVERSITY BOX 571173	NO
1247 0116	1409 36TH ST NW	GEORGETOWN UNIVERSITY PRES & DIR	NO
1248 0146	1410 36TH ST NW	GEORGETOWN UNIVERSITY AUXILIARY SERVICES	NO
1248 0145	1412 36TH ST NW	GEORGETOWN UNIVERSITY UNIVERSITY TOWNHOUSE	NO
1248 0819	1414 36TH ST NW	GEORGETOWN UNIVERSITY UNIVERSITY TOWNHOUSE	NO
1248 0139	1416 36TH ST NW	GEORGETOWN UNIVERSITY - PRESIDENT & DIRECTORS UNIVERSITY TOWNHOUSE	NO
1248 0138	1418 36TH ST NW	GEORGETOWN UNIVERSITY - PRESIDENT & DIRECTORS UNIVERSITY TOWNHOUSE	NO
1248 0137	1420 36TH ST NW	GEORGETOWN UNIVERSITY - PRESIDENT & DIRECTORS UNIVERSITY TOWNHOUSE	NO
1247 0126	1421 36TH ST NW	GEORGETOWN UNIVERSITY AUXILIARY SERVICES	YES
1248 0136	1422 36TH ST NW	GEORGETOWN UNIVERSITY UNIVERSITY TOWNHOUSE	NO
1248 0135	1424 36TH ST NW	GEORGETOWN UNIVERSITY UNIVERSITY TOWNHOUSE	NO
1248 0134	1426 36TH ST NW	GEORGETOWN UNIVERSITY STE 400	YES
1248 0133	1428 36TH ST NW	GEORGETOWN UNIVERSITY - PRESIDENT & DIRECTORS UNIVERSITY TOWNHOUSE	NO
1248 0132	1430 36th ST NW*	GEORGETOWN UNIVERSITY - PRESIDENT & DIRECTORS UNIVERSITY TOWNHOUSE	NO
1248 0131	1432 36TH ST NW	GEORGETOWN UNIVERSITY - PRESIDENT & DIRECTORS UNIVERSITY TOWNHOUSE	NO
1248 0130	1434 36TH ST NW	GEORGETOWN UNIVERSITY - PRESIDENT & DIRECTORS UNIVERSITY TOWNHOUSE	NO
1248 0129	1436 36TH ST NW	GEORGETOWN UNIVERSITY UNIVERSITY TOWNHOUSE	NO
1248 0128	1438 36TH ST NW	GEORGETOWN UNIVERSITY - PRESIDENT & DIRECTORS UNIVERSITY TOWNHOUSE	NO
1248 0127	1440 36TH ST NW	GEORGETOWN UNIVERSITY UNIVERSITY TOWNHOUSE	NO
1248 0126	3600 P ST NW	PRESIDENT AND DIRECTORS OF GEORGETOWN UNIVERSITY	NO
1223 0072	3613 PROSPECT ST NW	GEORGETOWN UNIVERSITY UNIV TWNHSE OFFICE	NO
1223 0073	3615 PROSPECT ST NW	GEORGETOWN UNIVERSITY UNIV TWNHSE OFFICE	NO
1223 0073	3615 1/2 PROSPECT ST NW	GEORGETOWN UNIVERSITY UNIV TWNHSE OFFICE	NO
1223 0065	3617 PROSPECT ST NW	GEORGETOWN UNIVERSITY UNIV TWNHSE OFFICE	NO
1223 0066	3619 PROSPECT ST NW	GEORGETOWN UNIVERSITY UNIV TWNHSE OFFICE	NO
1223 0067	3621 PROSPECT ST NW	GEORGETOWN UNIVERSITY UNIV TWNHSE OFFICE	NO
1223 0074	3623 PROSPECT ST NW	GEORGETOWN UNIVERSITY UNIV TWNHSE OFFICE	NO
1223 0800	3625 PROSPECT ST NW	GEORGETOWN UNIVERSITY PRESIDENT & DIRECTOR	NO

1223 0801	3627 PROSPECT ST NW	GEORGETOWN UNIVERSITY	NO
1223 0841	3629 PROSPECT ST NW	GEORGETOWN UNIVERSITY UNIV TOWNHSE OFFICE	NO
1223 0840	3631 PROSPECT ST NW	GEORGETOWN UNIVERSITY UNIV TOWNHSE OFFICE	NO
1230 2001	1301-1 33rd ST NW	PRESIDENT AND DIRECTORS OF GEORGETOWN COLLEGE	NO
1230 2002	1301-2 33rd ST NW	PRESIDENT AND DIRECTORS OF GEORGETOWN COLLEGE	NO
1230 2003	1301-3 33rd ST NW	PRESIDENT AND DIRECTORS OF GEORGETOWN COLLEGE	NO
1230 2004	1301-4 33rd ST NW	PRESIDENT AND DIRECTORS OF GEORGETOWN COLLEGE	NO
1230 2005	1301-5 33rd ST NW	PRESIDENT AND DIRECTORS OF GEORGETOWN COLLEGE	NO
1230 2006	1301-6 33rd ST NW	PRESIDENT AND DIRECTORS OF GEORGETOWN COLLEGE	NO

SQUARE LOT	ADDRESS	NAME OF PROPERTY OWNER	BBL

Attachment D

Editorial in the "Current" newspaper September 28, 2011

THE GEORGETOWN CURRENT

Big plan on campus

Georgetown University has taken a number of excellent steps recently to limit the disruption that students cause in the nearby residential neighborhood.

The school has added extra security patrols, twice-daily litter pickup and a weekend shuttle service to transport students to and from M Street bars. Officials also announced that they would drop a proposal to build a new on-campus road for buses, which neighbors had said would negatively impact the adjacent Glover Archbold Park.

But the school says it can add housing for no more than 250 additional students on campus. And that's a sticking point.

Neighbors say all of the other efforts — which the university notes were neither simple nor cheap — amount to a Band-Aid without additional on-campus beds. We tend to agree.

Students will always have reason to utilize the neighborhood, but their late-night noise and other disruptions can only be truly minimized by moving the bulk of their activity onto campus.

The community and the Office of Planning have both called for 100 percent on-campus housing. We think 95 percent would be reasonable, allowing some wiggle room for students who can prove themselves mature enough to live in the community. We hope the Zoning Commission will follow suit, setting milestones for progress over the 10-year life of the campus plan. We look forward to seeing a solid plan for truly relieving the frustrations residents of West Georgetown and Burleith have faced for years.