BEFORE THE ZONING COMMISSION AND
BOARD OF ZONING ADJUSTMENT OF THE DISTRICT OF COLUMBIA

FORM 129 – ADVISORY NEIGHBORHOOD COMMISSION (ANC) REPORT

Before completing this form, please review the instructions on the reverse side.

Pursuant to Subtitle Z § 406.2 and Subtitle Y § 406.2 of Title 11 DCMR Zoning Regulations, the written report of the Advisory Neighborhood Commission (ANC) shall contain the following information:

IDENTIFICATION OF APPEAL, PETITION, OR APPLICATION:

Case No.:	20-31	**Case Name:**	American University Campus Plan
Address or Square/Lot(s) of Property:	4400 Massachusetts Ave. NW		
Relief Requested:	Approval of Campus Plan		

ANC MEETING INFORMATION

Date of ANC Public Meeting:	0	4	/	1	1	/	2	0	**Was proper notice given?:**	**Yes**	☒	**No**	☐		
Description of how notice was given:	ANC3D Website; 3 separate neighborhood list servs														
Number of members that constitutes a quorum:	5								**Number of members present at the meeting:**	9					

MATERIAL SUBSTANCE

The issues and concerns of the ANC about the appeal, petition, or application as related to the standards of the Zoning Regulations against which the appeal, petition, or application must be judged (*a separate sheet of paper may be used*):

See attached letter

The recommendation, if any, of the ANC as to the disposition of the appeal, petition, or application (*a separate sheet of paper may be used*):

Approve. See attached letter

AUTHORIZATION

ANC	3	D	**Recorded vote on the motion to adopt the report (i.e. 4-1-1):**	8-0-1
Name of the person authorized by the ANC to present the report:	Charles Elkins			
Name of the Chairperson or Vice-Chairperson authorized to sign the report:	Charles (Chuck) Elkins			
Signature of Chairperson/ Vice-Chairperson:	Chuck Elkins		**Date:**	12/15/2020

ANY APPLICATION THAT IS FOUND TO BE INCOMPLETE MAY NOT BE ACCORDED "GREAT WEIGHT" PURSUANT TO 11 DCMR SUBTITLE Z § 406 AND SUBTITLE Y § 406.

Advisory Neighborhood Commission 3D
Government of the District of Columbia

December 15, 2020

Members of the Zoning Commission
Office of Zoning
441 4th Street NW #200
Washington, DC 20001

RE: American University's Campus Plan for 2021: Case #20-31

Dear Members of the Zoning Commission:

In a publicly-noticed regular meeting on November 4, 2020, with a quorum of five Commissioners present, ANC3D voted to submit this letter to the Zoning Commission regarding American University's Campus Plan for 2021.

Summary

ANC3D strongly endorses the 2021 Campus Plan developed by American University and the American University Neighborhood Partnership and urges the Zoning Commission to approve it. In this letter, we describe our review process, examine questions raised by neighbors concerning this plan and our response to them, identify certain issues that required additional discussion with the university, and describe how they were resolved. We end with summarizing our conclusions and recommendations.

Our Commission's Process

At our Commission's July meeting, American University presented the contents of its "Framework" document, which represented the outline and major conclusions envisioned for its Campus Plan. Commissioner Kravitz, in his capacity as Co-Chair of the American University Neighborhood Partnership (the Partnership), provided the Commission and the audience with an overview of the development of the Partnership. Key milestones and guiding principles were described in detail. Questions were solicited from the audience and Commissioners.

During this July Commission meeting, our Commission adopted a non-binding schedule for consideration of the Campus Plan consisting of extensive discussions at both our September and October meetings with a vote provisionally scheduled for our November meeting. Neighbors were informed of these forthcoming meetings and this proposed schedule not only through the posting of the draft schedule prior to the July meeting and the discussion of it at the July meeting, but also through notices in the

local listservs as well as on our Commission's website. Throughout this process, neighbors were urged to bring any concerns they might have to the attention of our Commission.

At the September meeting of our Commission, American University presented a summary of its Framework and then Commissioner Kravitz, again on behalf of the Partnership, presented an extensive discussion, detailing many of the Partnership's major decisions (and the reasoning behind them) that shaped the Framework and helped inform the drafting of the Campus Plan. These Partnership discussions had evolved over the course of the preceding year and a half through reviews by the Partnership working groups (which neighbors were invited to join) and the Partnership Steering Committee composed of leaders from neighborhood organizations and university officials. Following these two presentations, the audience and the Commissioners were given the opportunity to raise questions and make comments.

Following the ANC's September 2nd meeting, American University released its draft of the full Campus Plan on September 8 and notices were placed on the Commission's website and in the local listservs of the Plan's availability along with the ANC's intention to discuss the actual Plan itself in detail at its October meeting.

At the Commission's October meeting, American University presented a summary of the full draft Campus Plan, and a discussion ensued. This discussion continued at a special meeting of ANC3D on October 21st.

Public Engagement

American University conducted an extensive public engagement process for this campus plan over and above its interaction with the Partnership. These meetings are described in detail in the University's submission at Exhibit F and therefore will not be repeated here. At least one member of ANC3D attended most of these numerous meetings in order to hear public concerns.

Community Questions Regarding the Campus Plan

A number of issues were raised during the consideration of the 2021 plan in various forums including ANC3D meetings. Below we list the primary issues raised and provide our Commission's conclusions on each of them.

1. Enrollment Estimates for the 10 Years of the Plan:

Should the ANC have required American University to estimate its enrollment, by category, for the 10 years covered by the draft Campus Plan? Without such data, is it possible for the ANC to do a complete review of this Campus Plan?

Both the University and the Partnership addressed this issue. The Partnership did not request enrollment projections from the university. The Partnership reported several reasons for this, the most salient being that enrollment projections provided during Campus Plan proceedings are non-binding and that projected enrollment numbers provided during previous Campus Plan proceedings have not proven to be particularly accurate over the ensuing 10-year horizons. This reasoning was explained to ANC3D, which also did not request enrollment projections from the university. The ANC additionally notes that enrollment projections are not required by the Zoning Commission or the Office of Planning during Campus Plan proceedings.

The Partnership argued that the total number of students, even undergraduate students, is not a good indicator of the potential objectionable impacts of a university's operations on the surrounding neighborhoods. Instead, the Partnership suggested, and the ANC concurred, that the policies put in place to mitigate adverse impacts of the university's operations are more important. Thus, the Partnership worked to create robust university plans to handle impacts of its proposed buildings, transportation issues, and off-campus living impacts on the neighborhood. The ANC shares with the Partnership the belief that the best way to control potential impacts is through these plans and that any review of a Campus Plan should focus on these plans instead of enrollment projections.

Especially since the University has proposed an enrollment cap encompassing all students, the ANC further believes that holding a university to tight numeric limits or estimates of certain categories of students -- such as undergraduates -- is too blunt an instrument for effectively controlling impacts of a university's students on surrounding neighborhoods and that an examination of the university's commitments to deal with certain kinds of impacts is a preferable means of review. For that reason, ANC3D has focused on American University's placement and orientation of proposed buildings, its transportation plans, and its enhanced program to deal with the impact of students living off campus in the neighborhood and has not asked the University to project enrollment over the 10 years of the plan.

Finally, some neighbors have expressed concern that while the University says it plans to add approximately 500 new beds under this Plan, the capacity of the new dormitories shown in the Plan could accommodate 910 new beds. Under the 67% bed requirement for undergraduates, this would mean that the University could admit up to 1358 additional undergraduates. Both the Partnership and the ANC have reviewed this Plan assuming that in fact the 1358 additional undergraduates could materialize during the life of this Plan. With the mitigation efforts undertaken during the drafting of this Campus Plan, the ANC believes that this number of new undergraduates, even if realized despite expectations to the contrary, would not result in objectionable impacts.

2. <u>Should ANC3D Have Delayed Its Vote until Closer to the Hearing?</u>

Some neighbors have argued that ANC3D should not vote on November 4 before the University formally submits its Campus Plan to the Zoning Commission. On October 1, 2020, the University filed its intent to submit its Campus Plan to the Zoning Commission. As a result, neighbors within 200 feet of the University were notified of the University's intent. The Campus Plan Framework document has been widely advertised to the larger neighborhood since March of 2020 and the actual Campus Plan draft was made widely public on September 8. Numerous neighborhood meetings have been held to advise the neighborhood of the University's intent and to solicit comments or concerns. These have been successful as evidenced by the over 145 questions that were submitted to the University and by the University's replies that were brought to the attention of Commissioners and the community by their being highlighted on the ANC's website. The ANC itself started its official review of the Campus Plan at its July meeting and then held four more sessions on the plan at its regularly scheduled meetings in September, October, and November as well as a special meeting on October 21st. Consequently, members of the community have been well informed of the content of the Campus Plan and given numerous opportunities to express any concerns.

Some neighbors have argued that the Campus Plan is incomplete and does not meet the requirements of Subtitle X, Section 101.8 and Subtitle Z, Section 302.10. Our reading of these regulations did not result in identifying areas where the Campus Plan falls short of the requirements. However, there is some understandable and possible disagreement about the interpretation of the new regulations in terms of where the line is to be drawn between what is required with this initial application and what is required with future applications for further processing. This is a technical point that the ANC3D leaves to the Zoning Commission to determine as it reviews this Campus Plan.

Finally, while ANC3D was asked by the university to vote on the Campus Plan prior to its formal submission to the Zoning Commission so that the ANC's report could be included in the submission materials, ANC3D has reserved time on its December 2020 meeting agenda to ensure the submitted version of the Campus Plan matches, as promised, the version that the ANC voted upon. As a result, ANC3D has the opportunity in December and up to the time of the hearing on this Campus Plan to supplement or change its advice to the Zoning Commission if new facts or concerns surface in the meantime.

In short, opportunities for community engagement have been plentiful and the integrity of the ANC review process has been preserved. Any arguments that neighbors have not had a chance to participate in the review of this Campus Plan or to bring any future concerns to the ANC's attention for action are, in the view of the ANC, entirely without merit.

3. Should parking garages be built beneath buildings #11-12, and 15

Neighbors have expressed concern about whether building new parking garages beneath two of the development sites in the Campus Plan will generate adverse impacts on the community in terms of traffic congestion and related effects. Our Commission believes that it is entirely appropriate to examine whether or not the building of these parking garages may have an objectionable impact on the community, but that it is premature to address this issue at this stage of the proceedings. The best time to consider these potential impacts is at the time of further processing for these sites when there will be significantly more details available to inform these decisions.

4. Do the proposed buildings impose objectionable impacts?

Neighbors raised questions about the mass of the proposed buildings, their height, and their use (administrative, residential, student life). During the development of the Framework document that laid the groundwork for the actual Campus Plan, many of these concerns were raised and the University made a number of changes to adjust the massing and height of key buildings and to keep student life functions away from close-by neighborhoods such as Westover Place. In reviewing the resulting plans, ANC3D found that at the generality at which this Campus Plan is required to be drafted at this stage in the proceedings, these buildings do not appear to pose objectionable impacts. ANC3D reserves the opportunity, of course, to examine these buildings again at the time of further processing where more details and studies will be available. Should objectionable impacts be found at that stage, ANC3D will raise them with the University and, where necessary, with the Zoning Commission.

5. Are there objectionable impacts related to transportation in this Campus Plan?

Because of the scale of the elements of this Campus Plan that might affect transportation issues, ANC3D does not anticipate that there will be objectionable impacts related to increased traffic or parking in the

neighborhood. In addition, the University is committing to continuing to conduct an aggressive Transportation Demand Management program to minimize the number of single-operator vehicles driven by staff and students coming to the campus and to enforce the Good Neighbor Parking Policy that discourages university-associated drivers from parking in the neighborhood. Once again, if new concerns arise before the hearing on this Campus Plan or at the further processing stage, ANC3D stands ready to raise them with the Zoning Commission. Additionally, we appreciate the University's creation and sharing of the Comprehensive Traffic Review so early in the Campus Plan process. The Comprehensive Transportation Review has been a topic of discussion and revision for several months already, which is roughly six months before the University would be required to share it with the public.

6. Are there objectionable impacts related to student behavior, especially off-campus?

In this draft Campus Plan, the University is committed to enhancing its programs to deal effectively with objectionable off-campus student behavior. In particular, the University has proposed to emphasize prevention of behavior problems by fully and frequently informing students of the University's expectation that students adhere to the Student Code of Conduct and District of Columbia laws and to take appropriate action when students deviate from the Code. The University has committed to work closely with the Partnership and the ANC to monitor the effectiveness of its enhanced program and to seek adjustments as possible improvements become apparent. ANC3D believes that this enhanced program has the strong potential to mitigate the objectionable impacts that have been the subject of complaints from neighbors in the past.

7. Does the Campus Plan need an Undergraduate Enrollment Cap?

Several universities are subject to an undergraduate enrollment cap. One of the purposes of such an undergraduate enrollment cap is to impose some control over potential objectionable impacts caused by having "too many" undergraduates. American University does not have an explicit undergraduate enrollment cap, but does have an indirect one in the form of a requirement to maintain a supply of university-provided housing sufficient to house 67% of its full-time undergraduates. ANC3D concluded that the best way to mitigate potential objectionable impacts of students is through enhanced policies related to student conduct and transportation, as well as careful review of any proposed new buildings. ANC3D finds that there is a good balance between that general constraint imposed by the 67% bed count and the enhancement of the student life and transportation programs found in this Campus Plan. Therefore, ANC3D supports the maintenance of the 67% rule plus the enhanced mitigation programs rather than an explicit undergraduate enrollment cap.

Issues That Have Required Additional Discussion with the University

The ANC3D review of the September 8 Draft Campus Plan and the associated Comprehensive Transportation Review document identified eight issues that have warranted additional discussion with the University. The University released the final version of the Campus Plan on October 27. Below we describe these concerns and how they have been resolved between the draft Campus Plan and the final Campus Plan.

1. Jacobs' Field Sound Wall and Conditions

In the September 8th draft of the Campus Plan, the University announced that it plans to build a sound wall at the edge of Jacobs Field in order to mitigate the noise impacts of the use of this field on an

adjacent property. The draft included a set of more liberal conditions that the University proposed take effect once the sound wall is erected. The ANC concluded that while some changes to the conditions may well be appropriate once the sound wall is built, it was premature to determine what those new conditions should be until the wall is designed, the sound generating sources are geographically determined, and the acoustical results are calculated by acoustical engineers.

In its final Plan the University dropped these new conditions, postponing the drafting of any new conditions until further processing for the sound wall. ANC3D found this change in the draft Plan met its previous concerns, provided the current conditions are maintained and actively enforced.

2. Master Leases

During the implementation of the 2011 Campus Plan, the University experienced delays in the construction of the East Campus dormitories. Consequently, the University came to ANC3D and asked for the Commission's support for a temporary exception to the 67% requirement for housing undergraduates that would allow master leases to count toward the 67% rule. ANC3D gave its support, and the Zoning Commission subsequently granted the University this relief.

At that time, the Master Lease in the Berkshire Apartment building was the subject of a number of complaints from other tenants, and subsequently the University wisely chose to move its Master Lease to The Frequency building at the Tenleytown Metro Station where the University was able to obtain almost all of the units. This acquisition of the use of virtually all of the units eliminated the conflicts inherent in running a student dormitory in a building with numerous non-student residents.

During the review of the draft Campus Plan, there was a general consensus that Master Leases, such as the one at The Frequency building where almost all of the units are part of the lease, successfully mitigate any objectionable impacts and should be allowed to continue counting towards the 67% bed count requirement. However, in the September 8th draft 2021 Plan, the University sought to broaden this into a permanent exception to have all Master Leases count toward the 67% requirement, no matter where they are or what percentage of the total units are to be leased.

ANC3D concluded that Master Leases should be evaluated on their own merits in terms of whether or not a proposed Master Lease creates objectionable impacts on the community. We support having master-leased beds in which the university acquires all or almost all of the building's beds as counting towards the 67% requirement without further consideration. These master lease arrangements do not create unmitigated and unreasonable adverse impacts. We concluded, however, that other potential master lease arrangements need to be evaluated individually and should not automatically count towards the 67% requirement without further review.

In its final Campus Plan the University retains the policy that Master Leases that cover all or almost all of the units in a building would count toward the 67% bed requirement. With regard to all other proposed Master Leases, the University would present the proposed Master Lease to ANC3D and ANC3E during their regular meetings and the ANCs would then have the opportunity to address the matter with the public at their next regularly scheduled meeting, should they see fit. Then, the approval of the lease as counting toward the 67% requirement would be addressed by the Partnership, on whose Steering Committee ANC3D and ANC3E representatives serve.

ANC3D finds this arrangement satisfactory because it ensures a full public review of the proposed Lease where the ANC finds that appropriate.

3. Reporting of Parking Utilization:

The University reports periodic measurements of the utilization of the parking facilities in its buildings. In the past, however, these reports have aggregated the reports from all of its buildings into one number indicating the utilization across all of its facilities. ANC3D suggested to the University that these periodic measurements be reported additionally for each general location (main campus, East Campus, Tenley Campus, 4801 Massachusetts). While the ANC acknowledges the University's frequent and convenient shuttle program running between different geographically-separated campus facilities, a single crowded parking garage may lead to increased parking in the neighborhood. Identifying this potential problem through these periodic measurements would allow the Partnership and the ANC to discuss possible mitigation measures before the problem becomes acute.

In response, the university has agreed to provide annual reports to the Transportation and Parking working group that detail utilization rates at the Tenley, East, Main Campuses and the Spring Valley Building. These reports will be available to the ANC, and we find this a satisfactory solution the problem we have identified.

We would add that this approach seems preferable to setting any minimum parking requirement as has been suggested by some neighbors. A minimum parking requirement would be an indirect and inflexible tool for controlling parking in the neighborhood. It would not respond to changes in automobile ownership and use patterns (and hence campus parking demand) that are likely to change over the 10-year span of this Campus Plan. The ANC believes the University's more direct and flexible approach consisting of three components provides the best assurance to the neighborhood that university parking in the neighborhood will not become a serious problem:

- The periodic survey of parking utilization;
- A continuation of the University's aggressive program to encourage its students, staff, and visitors to use alternative means of transportation, adjusted, if needed, if the demand were to put a strain on the parking capacity (which is unlikely); and
- Continued active enforcement of the University's Good Neighbor Parking policy

4. Bicycle Infrastructure along Nebraska Avenue:

There is a lack of adequate bicycle infrastructure along Nebraska Avenue from Tenley Circle near the Tenleytown Metro, past the Main campus, to Rockwood Parkway at the edge of the campus. Improved infrastructure in this corridor would serve both the neighborhood and the University's students, faculty, and staff. A plan to improve this infrastructure is contained in the District Department of Transportation (DDOT) Rock Creek Far West Livability Study but has not received priority attention from that Department.

In the draft Campus Plan, the University offered to respond to any DDOT initiative in this area, but ANC3D asked the University to join with the two local ANCs in a proactive effort to persuade DDOT to move this project up on its priority list. The University's active involvement is important because there

is the possibility that implementation of this infrastructure project might involve the use of some of the University's land. It is important that DDOT know that the University is not just willing to discuss the project if asked, but is actively promoting it.

In response, the university agreed to update the CTR recommendations to provide that AU will collaborate with DDOT, ANCs and other interested community stakeholders to effectively advance the recommendations contained within DDOT studies including bicycle and multi-use facilities adjacent to American University property. This agreement has satisfied the ANC's concern.

5. Actively addressing the Vehicles-for-Hire problem on Nebraska Avenue and Massachusetts Avenue:

One of the loudest complaints about the University that ANC3D Commissioners hear from the public is the frequent violation of DC's traffic laws by Vehicles-for-Hire that stop in the travel lane on both Nebraska Avenue and Massachusetts Avenue near the campus to pick up and discharge their passengers. This behavior creates traffic congestion that is a serious irritant to the local community. The University has tried to encourage the drivers of these vehicles to use pickup and drop off locations on campus instead, but, not surprisingly, there appears to be little inclination for these drivers to do so. Enforcement of the law by the Metropolitan Police Department (MPD) against stopping in a travel lane, while effective on a one-time basis, is not the long-term solution because of MPD resource constraints.

This problem of traffic disruption by these drivers needs to be solved, and ANC3D believes the University must remain proactive in spurring the Department of Transportation to find a solution. While the inability to find an adequate solution remains the fault of DDOT, we asked the University to join the neighboring ANCs in pressing the Department to find solutions. While we gather that DDOT is generally opposed to possible solutions such as a layby or other curb cuts to move these vehicles out of the travel lane, the University needs to work to persuade the Department to allow the implementation of this or some other solution to cure this problem.

In response, the University agreed to update the CTR recommendation to indicate that it will continue to collaborate with members of the community and DDOT to explore solutions to mitigate the adverse impacts associated with pick-ups/drop offs on Nebraska and Massachusetts Avenues adjacent to AU campus locations. ANC3D will work with the University and DDOT to find a satisfactory solution to this problem.

6. Student Life Activities on the East Campus

The University has proposed to use a portion of Building #15 for student life activities. At the request of the residents of Westover Place, which is adjacent to the site, the University located these activities in the portion of the building furthest away from Westover Place, which was appreciated. However, there is still concern among Westover Place residents about the nature of these activities and their impact on the wellbeing of Westover Place residents. While the decision regarding exactly what student life activities will be placed in Building #15 should be dealt with at the further processing stage, ANC3D has asked the University to commit to plan for these activities so as to mitigate any objectionable impacts from these activities on Westover Place residents

In response, the University indicated it was committed to such mitigation.

7. Add Projected Bed Counts to Proposed Buildings In the Campus Plan

While those who have participated in the Campus Plan meetings throughout the past two years are aware of the envisioned bed counts for each of the proposed potential residential buildings in the draft Campus Plan, some neighbors may not be as knowledgeable about the scope of possible construction. Envisioned square footages were displayed for each potential building, but ANC3D believed the document would be more useful to the broader public if the potential residential buildings also listed the envisioned number of beds associated with each project.

The University has included this information in the final version of the Campus Plan.

8. Periodic Assessment of Campus Plan Performance:

The public is infrequently reminded of the provisions inserted into a Campus Plan designed to benefit and protect the local community, such as those provisions that deal with new buildings, parking in the neighborhood and student behavior off-campus. ANC3D recommended to the University that a discussion of Campus Plan performance occur on a regular basis at ANC meetings, approximately twice a year on a mutually agreed upon schedule, using appropriate metrics and data arrived at in collaboration with the Partnership. This would have the benefit of having a much wider portion of the public than normally attends CLC meeting hear how the university is actively responding to parking, student behavior, and other community issues, thereby encouraging the public to avail themselves of these services when problems are occurring instead of allowing them to fester. In addition, Commissioners and community members would thereby have the opportunity to make suggestions to the University on policies and operations that continue to ensure objectionable impacts are adequately mitigated. These suggestions could therefore be considered by the University while these programs are being implemented instead of waiting until the development and review cycle of the next Campus Plan.

The University indicated that it does not object to these periodic reports to ANC3D.

ANC3D Independence

Before concluding, we wish to speak a bit more on the independence of the ANC3D review process. Three of ANC3D's 10 Commissioners were appointed by ANC3D to participate as members of the Partnership Steering Committee. These commissioners were part of the consensus reached by the Partnership as a whole prior to the ANC review. This is, of course, customary and appropriate. ANCs often appoint representatives to participate in neighborhood-level and citywide organizations/activities. For many years, ANC3D has appointed one of its members to participate in the Georgetown University Partnership which, among other activities, developed Georgetown's Campus Plan. In a not dissimilar situation, ANC commissioners are members of the Community Liaison Committee, authorized by the current Campus Plan, by virtue of the office they hold as a Commissioner representing a particular neighborhood. In the case of the American University Neighborhood Partnership, three Commissioners whose Single Member Districts adjoin the main campus of the university were appointed by ANC3D to serve as representatives to the Partnership Steering Committee.

While neighborhood members of the Steering Committee are asked to reflect, as best they can, the views of the organizations they represent, they and their organizations are not bound by the consensus reached. Specifically, while the ANC Commissioners participating in the Partnership granted their consensus to the draft and final Campus Plan documents during Partnership proceedings, this did not

compel them to support the Campus Plan application once it was presented in public forums and they had an opportunity to hear further neighborhood concerns. This relationship was known and understood by all involved in the Partnership and throughout the extensive ANC3D public review process discussed above. Lastly, it should be noted that three commissioners do not constitute a quorum of ANC3D's 10-member commission [currently 9 sitting commissioners].

Conclusions and Recommendation

ANC3D strongly endorses American University's 2021 Campus Plan. The public process of review has been extensive and the ANC3D public review process thorough. The issues identified in this ANC3D review process have been adequately addressed in the final days of our review process. While reserving the opportunity to supplement this report if new issues arise before the date of the public hearing, we have completed our current review, and we urge the Zoning Commission to approve this ten-year Campus Plan.

Sincerely,

Chuck Elkins

Chuck Elkins, Chair