

THE GEORGE WASHINGTON UNIVERSITY
CHARLES E. SMITH CENTER ADDITION



BY THE GEORGE WASHINGTON UNIVERSITY

APPLICATION TO THE
DISTRICT OF COLUMBIA ZONING COMMISSION FOR REVIEW AND APPROVAL OF
CAMPUS PLAN AMENDMENT, MODIFICATION OF A FIRST-STAGE PUD, SECOND-
STAGE PUD APPROVAL, AND MODIFICATION OF FURTHER PROCESSING
APPROVAL

FEBURARY 25, 2020

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Property Owners' List	D
Notice of Intent to Surrounding Property Owners and Certificate of Notice	E
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I. INTRODUCTION

A. *Summary of Requested Action*

This statement and the attached documents support the application of the George Washington University to the Zoning Commission for review and approval of an amendment to the University's 2007 Foggy Bottom Campus Plan ("**Campus Plan**") and a modification of the University's First-Stage Planned Unit Development ("**PUD**") (together, "**Campus Plan/PUD**") as well as a Second-Stage PUD and modification to an existing further processing approval. The zoning actions will facilitate the renovation and construction of a minor addition to the Charles E. Smith Center ("**Smith Center**") to accommodate a dedicated practice court and related facilities for the men's and women's basketball teams ("**Project**"). Although the Project will increase the gross floor area of the Smith Center by only approximately 1,485 net square feet, (a percentage increase of approximately 2.3%), based on guidance from the Office of Planning, the University is processing the additional density as a second-stage PUD, which then triggers the requirements to amend the Campus Plan and First-Stage PUD to make the Smith Center a "Development Site."

The affected property is known as 600 22nd Street NW (Square 57, Lot 56) ("**Property**"). The Property is located in the RA-4 Zone District and within the boundaries of the Campus Plan/PUD. The Property is designated for residential/campus life/athletic uses under the Campus Plan/PUD. The Smith Center received further processing approval from the BZA in 1973 pursuant to BZA Application No. 11297. The Property is not designated as a development site in the Campus Plan/PUD for the Foggy Bottom campus. The U.S. Commission of Fine Arts also reviews the Project under the Shipstead-Luce Act.

To implement the proposed project, the University proposes the following zoning actions:

- An amendment to the Campus Plan and modification to the related First-Stage PUD to designate the Property as a “Development Site”;
- Second-stage PUD approval of the proposed Project; and
- Modification of the existing further processing approval to accommodate the Project.

Approximately 1,485 net new square feet of gross floor area devoted to university use will be created as a result of this application.

This PUD application is consistent with the District of Columbia Comprehensive Plan, D.C. Law 16-300, 10A DCMR (Planning and Development) § 100 et seq. (2006), as well as numerous goals and policies of the District of Columbia and the Foggy Bottom Campus Plan. The Property is located in the Institutional Land Use Category on the Future Land Use Map and the Generalized Policy Map. This Project will benefit the District by furthering public benefits and project amenities outlined in the Campus Plan / PUD, including sustainable design elements in new construction and landscape improvements in the public right-of-way. The University will use the second-stage PUD process to achieve relief from the lot occupancy provisions of the Zoning Regulations.

Submitted in support of this application are completed application forms, copies of the notices of intent to file the zoning actions, which were mailed to surrounding property owners and parties (with the certification of mailing and list of property owners), architectural drawings, plans, and elevations of the proposed project, and a map depicting the Zone Districts for the property and surrounding area. As set forth below, this statement and the attached documents meet the filing requirements for a modification of significance to an approved Campus Plan and related First-Stage PUD, second-stage PUD application, and a modification of significance to an

approved further processing application under Subtitle Z Sections 300 and 700 of the District of Columbia Zoning Regulations.

B. The Applicant

The Property is owned by the George Washington University. The University, which was founded in 1821 and has been located in the Foggy Bottom neighborhood since 1912, combines the resources of a major international research university with the dynamics of a vibrant, urban setting in the heart of the nation’s capital. GW’s location is key to its mission and critical to its success, as the opportunities and resources surrounding the campus attract outstanding students, faculty, and staff to GW and also help shape some of the University’s most successful academic, research, and clinical programs. By capitalizing on its location, GW delivers an educational experience that is distinctive and rewarding – encouraging students to take advantage of opportunities in international finance, public policy, democratic governance, and many other pursuits that are truly unique to DC.

C. Project Goals and Objectives and the Benefits of Using the PUD Process

Consistent with the goals of the approved Foggy Bottom Campus Plan and related First-Stage PUD, additional density on the Foggy Bottom campus is processed as a PUD. The intent of this requirement was to ensure design review over major new construction and substantial renovations resulting in meaningful net increases in density. The Project increases the gross floor area of the Smith Center by approximately 2.3% and only affects a portion of the interior floor area of the building; however, based on guidance from the Office of Planning, the University concluded that the Project should not proceed for consideration as a “minor

deviation” under Subtitle A, Section 304 or as a “minor renovation” under Condition P-2 of the Campus Plan/PUD Order, but rather as a second-stage PUD under the Campus Plan/PUD. Accordingly, the PUD process is an appropriate way to effectuate the proposed Project in a manner that is consistent with the Zoning Regulations and the Campus Plan / PUD.

The PUD process outlined in Subtitle X, Chapter 3 of the Zoning Regulations serves as an appropriate development tool for the Project, as the PUD structure allowed for the implementation of the University’s “grow up, not out” strategy as well as the provision of meaningful public benefits and other commitments in exchange for the additional density and flexibility gained from the PUD process. Further, the PUD process provides the community and District agencies with the tools needed to ensure that the Project is well-designed and best meets the needs of the community while making sure that the density and uses are appropriate and the architecture is compatible with the surrounding neighborhood.

D. Development Timetable

The University intends to begin construction of the Project in Spring 2021, with completion in Fall 2021.

II. OVERVIEW OF THE FOGGY BOTTOM CAMPUS PLAN AND FIRST-STAGE PUD

In the Campus Plan/PUD Order, the Commission approved a new Campus Plan for the University's Foggy Bottom Campus as a means to provide for predictable, planned growth consistent with surrounding development patterns and guided by smart growth and transit-oriented development principles. The proposed Campus Plan incorporated a development plan, known as "Grow Up, Not Out," in reference to an effort to accommodate the University's forecasted academic and student housing needs within the existing Campus boundaries. The Campus Plan calls for increased density targeted at specific development sites within the Campus boundaries that are generally concentrated towards the core of the Campus, away from residential areas. The additional space is required to advance the University's academic mission and enhance the quality of its educational programs through new facilities that will address evolving technological and academic program needs as well as increase the number of on-campus beds.

In conjunction with the Campus Plan, the University sought and received First-Stage approval for a PUD for the Foggy Bottom Campus. The approved First-Stage PUD identifies 16 development sites referenced in the Campus Plan as future Second-Stage PUD projects, and it identifies the uses, height, gross floor area, and lot occupancy for each Second-Stage PUD development site. In addition, a PUD-related Map Amendment for many of these development sites was approved in conjunction with the First-Stage PUD. These sites and uses were individually evaluated and selected based on each site's current use and condition, suitability for redevelopment, existing campus use patterns, and the University's overall forecasted space requirements. The Commission recognized that the campus-wide PUD would provide certain project amenities and public benefits, including an advisory committee to foster communication

between the University and community representatives, streetscape improvements, sustainable development features, commitments to historic preservation and neighborhood-serving retail activity on certain portions of the Campus, construction of below-grade parking at various sites dispersed through campus, and off-campus commitments, all of which were determined as part of the First-Stage approval.

Since the approval of the Campus Plan/PUD in 2007, the University has moved forward with the implementation of many of the proffered benefits and amenities outlined in the conditions of the Commission's Order. These amenities include: the creation of the proposed historic district and related landmark designations for large portions of the Campus; the cessation of use of off-campus properties for undergraduate student housing; the implementation of streetscape improvements; commitment to sustainable design (which include one certified LEED Platinum building and eight certified LEED Gold buildings and renovation projects on the Foggy Bottom Campus) and the creation of new retail spaces along I Street.

The University has also advanced the implementation of the Campus Plan/PUD and has received approval from the Commission for five major development projects that include two new academic buildings, a new residence hall, a new museum, and a new parking garage. In addition, pursuant to the Campus Plan/PUD, the University and its development partners have secured approval for the redevelopment of commercial/investment sites along Pennsylvania Avenue, which have transformed the corridor with a vibrant mix of commercial office, residential and, ground-activating retail and restaurant uses. The most recent approved development at 2100 Pennsylvania Avenue NW is under construction.

Stewardship of existing campus facilities is also an important priority for the University. Independent of the Campus Plan/PUD, the University recently renovated administrative office

space at 1922 F Street NW; the University also recently received approval from the Commission for the renovation of Thurston Hall in the same square, with construction anticipated to commence this summer. Attention to existing buildings includes investment properties as well; the University's development partners have received approval for and are proceeding with meaningful renovations to the commercial office and retail spaces at 2000 Pennsylvania Avenue NW.

III. THE PROPOSED PUD PROJECT

A. *Site Location and Existing Building*

The Property consists of approximately 52,835 square feet of land area. It is a rectangular parcel bounded by G Street on the north, 22nd Street on the east, and F Street on the south. The Property is located within the University's Foggy Bottom campus and in the Foggy Bottom/West End neighborhood of Ward 2, within the jurisdiction of Advisory Neighborhood Commission 2A ("ANC 2A"). The Foggy Bottom-GWU Metrorail station is located two blocks north of the Property.

The Property is improved with the existing Smith Center, which was constructed in the mid-1970s and renovated in 2011. The Smith Center is the University's primary athletic facility for the majority of its intercollegiate athletic programs. (The Lerner Health and Wellness Center serves as the general fitness center for the bulk of the University population.) The Smith Center contains the primary court used by the men's and women's basketball program; the use of this space is shared with other athletic programs such as gymnastics and volleyball and for other University events requiring a large gathering space, such as convocation, concerts, and career fairs. The Smith Center also contains other athletic facilities, such as weight rooms and training facilities for student athletes as well as specialized facilities such as a natatorium (pool) used by aquatic athletic programs. Finally, the Smith Center contains support facilities (such as locker rooms) and administrative offices as well as other related campus life uses.

Other University uses and buildings are located to the west, north, and east of the Smith Center. Property to the south includes property owned by the University and other residential properties.

B. Project Description

Currently, the Smith Center's court is used by the men's and women's basketball programs as well as for practices and competitions by other athletic programs and by other University programs. When there are conflicts, practice for the basketball programs is displaced to the Lerner Health and Wellness Center's courts, which in turns displaces use of those facilities by other members of the University population.

Therefore, the University proposes to renovate a portion of the existing Smith Center to create new practice facilities for the basketball programs, including a dedicated double-height practice court. The creation of dedicated practice facilities for basketball programs is increasingly common in intercollegiate athletics, and the new space will allow the University to remain competitive with its peers.¹ As shown on the architectural plans, elevations, and drawings attached as Exhibit N in this application, a nine-foot deep bumpout is proposed on the north side of the Smith Center to make the existing space wide enough to accommodate the footprint of the court. The Project will also allow for the footprint of an existing upper-story auxiliary gym located above the new practice court to be expanded. No other changes are proposed to the facility.

Architecturally, the proposed bumpout will generally replicate the existing northern façade, with a regularized window and spandrel system articulated and framed by metal paneling. However, the new façade system will use high-performance, low-e insulated glazing that provides a significant increase in performance over the current decade-old system. Other improvements associated with the Project include a new high-efficiency HVAC system and LED

¹ The Commission may recall it approved dedicated training facilities for Georgetown University's basketball programs in Case No. 07-23 (2007), as modified by Case No. 07-23B (2012).

lighting for the practice court. The minor nature of the Project does not trigger the District's stormwater management regulations or Green Area Ratio requirements.

Therefore, the Smith Center will generally appear similar to current conditions when viewed from G Street (which is within the campus). An egress ramp that runs along the northern façade partially within private property before angling toward the public sidewalk will be relocated so that it runs along the façade bumpout yet remain within public space. The new ramp will be located entirely within the public parking area and will be bracketed by building entrance and egress improvements on either side, so it will not interrupt or otherwise adversely affect pedestrian travel along the clear sidewalk.

To effectuate the renovation and make room for the practice court, the University will decommission the existing aging natatorium and related facilities and re-accommodate aquatic athletic programs to off-campus facilities. (The existing natatorium does not meet regulation minimums for some sports so competitions are frequently held at alternate facilities.) The elimination of the natatorium will also reduce the energy and water consumption of the Smith Center.

C. Development Parameters Under the Zoning Regulations

The Property is currently located within the RA-4 Zone District, which permits a maximum height of 90 feet, and lot occupancy of 75%. FAR for the Property is aggregated with other residentially-zoned Property throughout the campus, which was anticipated to reach no more than 3.69 FAR upon full buildout of the Campus Plan/PUD.

The existing Smith Center has a height of 45 feet, a gross floor area of 64,973 square feet, and a lot occupancy of 77%. The proposed Project will increase the gross floor area of the Smith Center by approximately 1,485 square feet (2.3%) to 66,458 square feet. The Project will

also increase the lot occupancy of the Smith Center to approximately 79%. The proposed addition will have a height of approximately 34 feet, which matches the existing height of this portion of the Smith Center.

The following tabulation of development data highlights the Project’s compliance with the Zoning Regulations.

Table 1: Compliance With the Zoning Regulations

	<u>Zoning Requirements</u> (per Campus Plan / PUD)	<u>Existing Building</u>	<u>Proposed Project</u>
<u>Height</u>	90 feet	45 feet	34 feet
<u>Gross Floor Area*</u>		64,973 SF	66,458 SF
<u>Lot Occupancy</u>	75%	77%	79%
<u>Rear Yard</u>	15 feet	55’8”	46’8
<u>Parking</u>	Per Campus Plan	Per Campus Plan	N/A
<u>Bike Parking</u>	Per Campus Plan	Per Campus Plan	N/A
<u>Loading</u>	Per Campus Plan	Per Campus Plan	N/A
<u>GAR</u>	0.3	N/A	N/A

* FAR is aggregated on the residentially-zoned portions of the Campus. The Campus Plan/PUD approved a 3.69 FAR for the Campus; with the construction of the Project and the completion of all other approved construction, the Campus will have a 3.12 FAR.

Rear Yard. The Smith Center is currently set back from the street lot line along G Street by approximately 10’8”. This area is considered to be part of the Project’s “rear yard” and will remain compliant with the rear yard requirements after the completion of the Project. The Smith Center fronts on three streets and accordingly may measure its rear yard from the center line of the street at the rear of the lot. 11-F DCMR Section 305.2. Therefore, the Smith Center’s existing rear yard is approximately 55’8” feet as measured to the center line of G Street. The

Project will reduce the rear yard depth to approximately 46'8" feet, which is still more than triple the rear yard requirement of 15 feet.

Parking, Bicycle Parking, and Loading. Additions to an existing building of less than 25% do not trigger a vehicle or bicycle parking requirement (and, in any event, parking is established under the Campus Plan). 11-C DCMR Sections 704.1 and 802.5; see also Sections 701.12 and C 802.9. Similarly, an addition of less than 25% does not trigger the loading requirements. 11-C DCMR Section 901.6.

Green Area Ratio. GAR does not apply to additions and interior renovations of existing structures that does not exceed 100% of the assessed value of the building. 11-C DCMR Section 601.3.

D. Flexibility under the PUD Guidelines

The PUD process was created to allow greater flexibility in planning and design than is possible under conventional zoning procedures. Subtitle X Section 303.1 specifically allows the Zoning Commission to grant relief from any building development standard as part of the PUD process. Here, the University seeks flexibility from the lot occupancy requirement.

Lot Occupancy. The Smith Center currently exceeds the maximum permitted lot occupancy for the RA-4 Zone. The Project will increase the building's lot occupancy by two percentage points to 79%. The increase is minor and necessary to allow for the adaptive reuse of the natatorium into the practice court, since the size of the bumpout is driven by the required width of the practice court, and other uses in the building preclude expanding the double-height space in the other direction. Given the orientation of the Smith Center along three streets, the minor increase will not have impacts on the light and air of property to the north (which in any event is owned by the University).

IV. PLANNING ANALYSIS

A. *Land Use Impact*

As detailed in Section VI, the proposed PUD is fully consistent with the goals and policies of the Comprehensive Plan for the District of Columbia, which designates the Property for Institutional land use. The PUD will allow for the adaptive renovation of the existing athletic center to meet the University's programmatic needs. The PUD is also consistent with the goals of the approved Campus Plan, which calls for developing modernized facilities to continue to attract top-tier students and envisions G Street as a location for new construction that complements the existing built environment. The increased lot occupancy is also not inconsistent with the Campus Plan, which envisions lot occupancies of 90% for academic and other non-residential building types.

B. *Zoning Impact*

The proposed amendment to the Campus Plan, modification of the First-Stage PUD, Second-Stage PUD, and modification of further processing for the Project are all consistent with the intent of the Zoning Regulations and carry out the purposes of Subtitle X, Chapter 3, which is to encourage well-planned, efficient, and attractive development that exceeds what is achievable under matter-of-right development. Here, the PUD process, through the lens of the Campus Plan/PUD, allows the Commission to review an admittedly minor increase in density that allows for the renovation of a portion of the Smith Center in order to ensure that it is consistent with the goals of the Campus Plan. As noted above, while the lot occupancy will exceed the 75% maximum in the RA-4 Zone, the proposed 79% lot occupancy is within the Campus PUD/PUD's anticipated lot occupancy for nonresidential buildings and, in any event, the existing building already exceeds the lot occupancy limit.

C. Environmental and Facilities Impact

The proposed Project is a minor addition that will have no adverse environmental, infrastructure, or facilities impacts. Indeed, the Project will include a number of features that will enhance the energy efficiency of the Smith Center. As set forth on the transportation statement prepared by Wells & Associates and included as Exhibit F, the Project will have no adverse impact on transportation infrastructure or patterns.

V. SATISFACTION OF STANDARDS FOR A CAMPUS PLAN

As discussed above, the University requests approval of an amendment to the Campus Plan to designate the Smith Center as a development site as well as modification of further processing approval for the Project, which each require that the University demonstrate satisfaction of the standards of approval under Subtitle X, Section 101 of the Zoning Regulations. Furthermore, pursuant to Condition No. P-15 in the Campus Plan/PUD, the University must demonstrate how it satisfies the conditions of approval for a campus plan for the approval of the Second-Stage PUD. These standards are addressed below.

A. *Subtitle X Evaluation Standards*

The proposed campus plan amendment and the Project each satisfy the standards for approval of a campus plan, pursuant to Subtitle X, Section 101, as follows:

- X § 101.1 – As demonstrated herein, the proposed Project satisfies the standards of this chapter. The Property has already been approved for use as an athletic center pursuant to the original 1973 further processing approval.
- X § 101.2 – The Project is located so that it is not likely to become objectionable to neighboring property because of noise, traffic, parking, number of students, or other objectionable conditions. The Project accommodates the proposed practice court within the existing Smith Center, where it will be co-located with other similar uses. The activities that will take place within the practice court already take place within the Smith Center, so there will be no change in impact. The bumpout is located on G Street, oriented toward the center of campus and away from surrounding residential properties, so it will not have any perceived objectionable visual or other impacts.

To accommodate the Project, the University will need to relocate the existing athletic programs that use the natatorium. The University is currently in the process of evaluating and developing a plan for relocating such uses, most likely to an off-campus location where they will not to create objectionable impacts on the surrounding neighborhoods.

- X § 101.3 – Not applicable, as the uses in the Project are not commercial uses.

- X § 101.4 – The proposed uses are directly related to the educational mission of the University and they are consistent with the Property’s Institutional Land Use designation.
- X §§ 101.5 – 101.7 – The addition will be within the 90-foot height limit and even with the additional density, the University will remain within the 3.69 FAR for residentially-zoned property approved as a part of the Campus Plan/PUD. The proposed additional density is within the campus itself, and public streets and alleys were excluded from the above FAR calculation.
- X § 101.8 –As described herein, the Project is generally consistent with and furthers the 2007 Campus Plan.
- X § 101.9 – The Smith Center has already received further processing approval; the modification to that original approval is sought here along with a concurrent second-stage PUD.
- X § 101.10 – Not applicable.
- X § 101.11 – As described below in Section VII, the Project will promote various elements and policies of the Comprehensive Plan, and it will not be inconsistent with the Comprehensive Plan.
- X § 101.12 – With the construction of the Project, the FAR for the residentially-zoned portions of the Campus will be 3.12 FAR, and the FAR for the Campus as a whole will be 4.32 FAR, each of which is within the limit established by the Campus Plan/PUD, as modified by this application.
- X § 101.13 – The University has already met with the Office of Planning (“OP”) regarding the Project and will continue to work with OP as well as other relevant agencies as this application proceeds.
- X § 101.14 – As described above and throughout this statement, the proposed Project will not adversely affect neighboring properties. It is a minor addition to accommodate the renovation of a portion of an existing building with a use that already takes place within that building and has been previously approved under the special exception standards. Accordingly, the Project will be in harmony with the purpose and intent of the Zoning Regulations and Maps. Further, as described herein, this application satisfies the conditions for special exception standards in Subtitle X § 101.
- X § 101.15 – Not applicable. (As a side note, the extensive amount of time and process required here for what amounts to a very minor addition with no change in

building use or impact suggests consideration of a threshold for permitted minor deviations that is larger than 450 square feet.)

- X § 101.16 – Not applicable.

B. Subtitle Z Filing Standards

The campus plan amendment application satisfies the filing requirements of Subtitle Z, Section 302.

- Notice (Z §§ 302.6 – 302.8): As stated on the certification attached as Exhibit E, the University provided notices of its intent to file zoning application to (1) ANC 2A; (2) owners of all property within 200 feet of the proposed development site; and (3) the Foggy Bottom Association and West End Citizens Association, each of which were parties to the initial Campus Plan/PUD. The University also presented the application to ANC 2A after mailing of the notice at its January 15, 2020 public meeting. The application has also been presented to the Campus Plan Advisory Committee.
- Filing Information (Z § 302.10): The application contains all required information that is pertinent to the campus plan amendment requested herein, as follows:
 - Z § 302.10(a): The application form was completed through IZIS.
 - Z § 302.10(b): A Surveyor’s plat is attached as Exhibit C.
 - Z § 302.10(c): Information regarding existing and proposed conditions (including details on building mass, height, density, and use) is shown on the plans attached as Exhibit N.
 - Z §§ 302.10(d)-(e): Not applicable here, as no changes to student or employee counts are proposed (and, in any event, such counts consistent with the approved campus plan methodology are included in the most recent Fall 2019 Compliance Report attached as Exhibit H).
 - Z § 302.10(f): Information on surrounding neighborhood context is included in this statement and shown on the plans attached as Exhibit N.
 - Z § 302.10(g): The Project does not materially affect the existing use of the Smith Center. A transportation statement regarding the limited impact of the Project is included as Exhibit F.
 - Z § 302.10(h): The Property is not located within a historic district, though it is subject to CFA review and will be submitted for conceptual review concurrent

with the zoning application. The Project's sustainability features are addressed in the PUD portions of the statement.

- Z § 302.10(i): Not applicable.
- Z § 302.10(j): The existing streetscape is unaffected by the Project. The Project will adjust the location of an accessibility ramp that is already located within the public parking area adjacent to the sidewalk.
- Z §§ 302.10(k)-(l): Not applicable.
- Z § 302.10(m): A list of the names and addresses of the property owners within 200 feet of the Property is included in Exhibit D.

VI. PUD EVALUATION STANDARDS

A. *Second-Stage PUD Requirements*

This application complies with the process and requirements set forth in Subtitle X, Chapter 3 of the Zoning Regulations for review of a modification to a First-Stage PUD as well as for review of a Second-Stage PUD application. Specifically, this application complies with the requirements of Subtitle X, Section 300 and Subtitle Z, Section 300 as follows:

- Area Requirement (X § 301). The First-Stage PUD encompasses approximately 1,669,744 square feet of land area, which exceeds the minimum area requirement for a PUD in the RA-4, RA-5, MU-2, MU-9, and MU-30 Zone Districts, as set forth in Subtitle X § 301.
- Notice (Z § 300.7 – 300.9; 300.11(e); 300.12(d)). As stated on the certification attached as Exhibit E, the University provided notices of its intent to file zoning application to (1) ANC 2A; (2) owners of all property within 200 feet of the proposed development site; and (3) the Foggy Bottom Association and West End Citizens Association, each of which were parties to the initial Campus Plan/PUD. The University also presented the application to ANC 2A after mailing of the notice at its January 15, 2020 public meeting. The application has also been presented to the Campus Plan Advisory Committee.
- Filing Information (Z §§ 300.11 and 300.12): The application includes all required information, including:
 - Z §§ 300.11(a) and 300.12(a). The application form was completed in IZIS.
 - Z §§ 300.11(b) and 300.12(b). A Surveyor's Plat is included in Exhibit C.
 - Z § 300.11(c). Maps showing the location of the project as well as existing, proposed, and surrounding zoning are included as part of Exhibit N.
 - Z §§ 300.11(d), 300.12(c), and 300.12(j). This statement provides detailed information on the location, number, size, and types of uses to be located in the Project, as well as the Project's related features and impacts. Further, this statement addresses consistency of the application with the intent and purposes of the Zoning Regulations, the PUD process, and the Campus Plan / PUD.
 - Z §§ 300.11(f)-(g) and 300.12(e)-(h). Included in Exhibit N are the plans, elevations, and sections that are relevant to the extent of the Project, including a

detailed site plan; detailed landscaping plan; floor plans, elevations, and sections of the project; and a final detailed circulation plan.

- Z §§ 300.11(h) and 300.12(k). A list of the names and addresses of the property owners within 200 feet of the Property is included in Exhibit D.

B. Additional Filing Requirements from Conditions of Approval

Approval of the Campus Plan / PUD in Order No. 06-11/06-12 was based on a number of conditions that govern future second-stage PUD applications for development sites within the approved Campus Plan. The University's compliance with these conditions is briefly discussed as follows:

- Condition P-14: Second-Stage PUD Required for Development Resulting in Additional Density or a Change in Use. Condition P-14 requires that, except for minor renovation projects including those necessary to address building code compliance, no development on Campus resulting in additional density or change in use is permitted unless approved by the Commission as a Second-Stage PUD. Such development is limited to the sites identified in the Campus Plan / PUD at the uses, zoning, gross floor area, lot occupancy, and height called for in the approved plan.

Here, the University has requested modification of the First-Stage PUD as well as a related Campus Plan amendment to designate the Smith Center as a Development Site, which thus allows the proposed Project to be approved as a second-stage PUD consistent with this condition.

- Condition P-15: Satisfaction of Further Processing Standards. The standards have been addressed in Section V above.
- Condition P-16(a): Compliance with the Zoning Regulations and Approved Campus Plan. As detailed herein, the application complies with the applicable provisions of the Zoning Regulations as well as the contents of the approved Campus Plan, as amended.
- Condition P-16(b): Demonstration that Use, Height, Bulk, and Design is Sensitive to and Compatible with Adjacent and Nearby non-University Owned Structures and Uses. The proposed Project is minor and matches the height of the existing Smith Center. In any event, there are no non-University owned structures and uses near the location of the proposed addition.
- Condition P-16(c): Interim Leased Space for Activities Either Displaced by Construction or Intended to be Located Permanently in the Completed Structure. As noted above, the University is developing a plan to accommodate existing university uses that will be displaced by construction.

- Condition P-16(d): FAR Report. As detailed in the report attached as Exhibit G, the University's existing FAR of residentially-zoned property within the Foggy Bottom Campus Plan boundaries is 3.14 FAR. Upon completion of the proposed improvements as well as all other improvements currently pending before or approved by the Zoning Commission as well as under construction, the University's FAR of residentially-zoned property on the Foggy Bottom Campus will be 3.12 FAR. This FAR Report will be submitted directly to OP and the Zoning Administrator.
- Condition P-16(e): Foggy Bottom Campus Plan Compliance Report. The University's November 20, 2019 Compliance Report is attached as Exhibit H and demonstrates full compliance with the approved Campus Plan, as amended.
- Condition P-16(f): Streetscape Plan Implementation Progress Report. As detailed on the progress report attached as Exhibit I, the University has worked with DDOT, OP, and other District agencies, as well as community representatives, to implement the streetscape components of the Campus Plan / PUD.
- Condition P-16(g): Off-Street Parking Space Census. The University continues to meet its requirement to provide at least 2,800 off-street parking spaces. As detailed on the parking census attached as Exhibit J, as of November 20, 2019 the University provided a total of 3,035 off-street parking spaces. A full accounting of the existing number of off-street parking spaces is attached as Exhibit J.
- Condition P-16(h): Transportation Management Program Status Report. Led by its Transportation Management Coordinator, the University has implemented a comprehensive transportation management plan ("TMP") to promote alternatives to driving and eliminate adverse traffic and parking impacts. As detailed on the status report attached as Exhibit K, the University has successfully publicized and promoted transportation alternatives.
- Condition P-16(i): Advisory Committee Consultation. The University presented the Project to the Advisory Committee at a regularly-scheduled meeting on January 14, 2020. Notice of the meeting was provided to ANC 2A, FBA, and WECA, as well as through publication in the Foggy Bottom Current and via electronic notice. The Project was the featured topic of discussion at the meeting. Certification of the presentation to the Advisory Committee as well as copies of the meeting minutes are attached as Exhibit L. The University also introduced the project to ANC 2A at the ANC's regularly-scheduled January 15, 2020 public meeting. The University will continue to engage the Advisory Committee, ANC 2A and representatives of the Foggy Bottom/West End community regarding the project leading up to the public hearing.
- Condition P-16(j): List of Outsourcing Activities. The University has not, in any 30 day period since the filing of the Thurston Hall Renovation further processing application in August 2019, terminated 50 or more Foggy Bottom faculty or staff who were assigned to a specific University department or unit and then permanently replaced them with contractors or other persons not employed by the University.

- Condition P-17: Substantial Compliance. As demonstrated by the attached Compliance Report, the University is in substantial compliance with the conditions of the Campus Plan / PUD.

C. Public Benefits and Project Amenities

Subtitle X § 305.5 provides categories of public benefits and project amenities for review by the Zoning Commission. The objective of the PUD process is to encourage high-quality development that provides public benefits and project amenities by allowing applications greater flexibility in planning and design than may be possible under matter-of-right zoning. This Project fulfills the goals of the PUD process because it ensures that the additional density added to the Smith Center is reviewed by the Zoning Commission in the context of the Campus Plan/PUD, which delivered benefits ranging from historic preservation to improved streetscape and enhanced commitments regarding off-campus properties.

Here, the Project does not seek a significant amount of additional density, but it will utilize good sustainable design practices that will increase the energy efficiency and performance of the Smith Center. Specific features include the new high-performance, low-e insulated glazing, a new high-efficiency HVAC system, and LED lighting for the practice court. All of these elements constitute public benefits under Subtitle X, Section 305.4(k). (Prior to this Project, the University recently installed 14,000 square feet of solar panels on the Smith Center in 2018/2019, which further demonstrates the University's commitment to the sustainable design and performance benefits of the Campus Plan/PUD independent of individual projects.)

VII. COMPLIANCE WITH THE COMPREHENSIVE PLAN

The proposed PUD is consistent with and fosters numerous goals and policies in the Comprehensive Plan.

The purposes of the District elements of the Comprehensive Plan for the National Capital are to: (1) Define the requirements and aspirations of District residents, and accordingly influence social, economic, and physical development; (2) Guide executive and legislative decisions on matters affecting the District and its citizens; (3) Promote economic growth and jobs for District residents; (4) Guide private and public development in order to achieve District and community goals; (5) Maintain and enhance the natural and architectural assets of the District; and (6) Assist in the conservation, stabilization, and improvement of each neighborhood and community in the District.

D.C. Code § 1-301.62 (2006). The Commission previously found that the Campus Plan/PUD was consistent with the Comprehensive Plan and would further the objectives and policies of the Plan including the land use, urban design, and preservation elements of the Plan, as well as the Ward 2 elements. See Order No. 06-11/06-12 at 16-17 (FOF 68-69). The proposed Project continues to further these elements of the Plan by accommodating the University's programmatic needs within the bounds of the Campus Plan.

A. *Land Use Maps*

The Property is located in the Institutional land use category on the Future Land Use Map (“**FLUM**”). Also, the Property is located in the Institutional category on the Generalized Policy Map (“**GPM**”). The Framework Element provides guidelines for using the FLUM and GPM; for institutional land, “change and infill can be expected on each campus consistent with campus plans,” 10 DCMR § 223.22, and changes in use should be “comparable in density or intensity to those in the vicinity, unless otherwise stated in the Comprehensive Plan Area Elements or in an approved Campus Plan.” 10 DCMR § 226.1(h).

In its consideration of the Campus Plan/PUD, the Commission found that the uses, buildings, and zoning changes described in the First-Stage PUD were compatible and consistent with the Institutional land use designation of the campus and the character of the surrounding neighborhood. Here, the Project is consistent with the FLUM as well as the approved Campus Plan, as amended, and it is compatible with the nearby mix of institutional and residential uses.

B. Land Use Element

The Land Use Element includes a series of policies applicable to institutional uses. It notes that these institutions make an important contribution to the District economy, with colleges and universities alone spending over \$1.5 billion annually and employing tens of thousands of workers. Policy LU-3.2.1 calls for support of ongoing efforts by District institutions to mitigate their traffic and parking impacts through the promotion of alternatives to driving such as bicycling and other transportation demand management measures. Policy LU-3.2.2 encourages large institutions such as universities to be corporate role models as they improve the physical environment through high quality architecture and design and expanded use of sustainable building methods. The proposed Project will further the above goals and policies.

C. Other Citywide Elements

Implementation of the approved Foggy Bottom Campus Plan will continue to permit the University's Foggy Bottom Campus to thrive and evolve, which furthers important policies and goals of the Economic Development and Education Elements of the Comprehensive Plan. It is consistent with Educational Element policies that encourage University growth and development through the campus plan process and attention to community issues and concerns. Policy EDU-3.3.2; EDU-3.3.3. Furthermore, the specific features of this Project implement the Education Element's call for good "corporate citizenship" by universities through commitments to high-

quality design and inclusion of sustainable development features. See Policy EDU-3.2.2; see also Policy LU-3.2.2. The Project also includes measures intended to mitigate traffic and parking impacts, which is supported by the Comprehensive Plan's Education Element. See Policy EDU-3.3.5.

The Economic Development Element notes that educational services, as one of the 20 largest private sector industries as well as one of the top 15 projected high growth industries in the District, are a "core" District industry. See Policy ED-1.1.2. In recognition of this importance, the Comprehensive Plan specifically "supports growth in the higher education" sector based on its potential to create jobs and income opportunities as well as enhance District cultural amenities. See Policy ED-2.4.1.

Finally, the Project and Campus Plan are consistent with the Near Northwest Area Element. The Advisory Committee formed under the Campus Plan provides improved communication and coordination between the University and its neighbors, as called for under Policy NNW-2.5.1. Furthermore, the Campus Plan calls for increasing density on the campus to meet future space and facility needs, consistent with Policy NNW-2.5.3. At the same time, the Campus Plan and related First-Stage PUD include mitigation measures, benefits, and amenities designed to ameliorate the traffic, parking, housing, and other impacts of the University and improve the character of the area as a whole.

VIII. CONCLUSION

For the foregoing reasons, the University submits that the enclosed applications meet the standards of Subtitle X, Chapters 1 and 3 as well as Subtitle Z, Chapter 3 of the Zoning Regulations; are consistent with the purposes and intent of the Zoning Regulations and Map; will enhance the health, welfare, safety, and convenience of the citizens of the District of Columbia; satisfy the requirements for approval of the included applications; provide significant public benefits; and advance important goals and policies of the District of Columbia. Therefore, the amendment to the Campus Plan, modification of the First-Stage PUD and related Zoning Map amendment, and Second-Stage PUD should be approved and adopted by the Zoning Commission.

Accordingly, the University respectfully requests that the Zoning Commission consider the applications together and set down the PUD components for a public hearing at the earliest possible date.

Respectfully submitted,

GOULSTON & STORRS

_____/s/_____

David M. Avitabile

Date: February 25, 2020