

April 30, 2013

VIA HAND DELIVERY

Mr. Anthony Hood, Chairman  
Zoning Commission  
441 4<sup>th</sup> Street, NW, Suite 210  
Washington, DC 20001

Re: **Z.C. Case No. 06-11J/06-12J**  
**GW Foggy Bottom Campus Plan / PUD – Square 77**  
**Site 77A – New Residence Hall**  
**Pre-Hearing Statement of the University**

Dear Chairman Hood and Members of the Commission:

Pursuant to 11 DCMR Section 3013.1, The George Washington University (“University”) hereby files its pre-hearing statement for the above-referenced case.

Background

The property that is the subject of this application is located midblock in Square 77 and consists of Lot 5, part of Lot 845, Lot 846, and a portion of a public alley to be closed (“Property”). The Property consists of approximately 33,413 square feet of land area, and is located in the R-5-D Zone District.

The Property is part of the University’s 2007 Foggy Bottom Campus Plan, which was approved by the Zoning Commission in Order No. 06-11 / 06-12. In conjunction with the approval of the Campus Plan, the Commission also approved a first stage PUD, which identified 16 development sites on the Campus for future improvements (together, “Campus Plan / PUD”). The Property was designated as a future development site for residential / campus life / athletic use. The Commission also approved rezoning of the Property to the C-3-C Zone District.

On December 17, 2012, the University filed an application for second stage approval of a PUD in order to permit the redevelopment of the Property as a new residence hall. The Property is located within the boundaries of the proposed Foggy Bottom campus historic district, which was proffered as a key benefit and amenity of the Campus Plan / PUD. The new residence hall will be comprised of retained portions of three existing residence halls located along H and I

Streets and a new 12-story infill addition that will connect the remaining portions of the existing residence halls (“Project”). The Project will provide approximately 332 net new additional on-campus student beds as well as ground floor retail space along I Street and two stories of below-grade space with additional retail, student life, and student services space.

Since the filing of the initial pre-hearing statement, the University has continued to refine the design of the Project in response to comments from the Commission, the Office of Planning (“OP”), the Historic Preservation Review Board (“HPRB”), the Historic Preservation Office (“HPO”), the District Department of Transportation (“DDOT”), and Advisory Neighborhood Commission 2A (“ANC 2A”). The additional changes are discussed below.

### **A. Project Design**

At the setdown meeting, the Commission and OP requested further study of the articulation and detail of the east and west façades, the color palette selected for the addition, the size and location of the roof structure, detailed ground-level perspectives, and further detail regarding the streetscape design.

#### **1. Historic Preservation Review**

Since setdown, the University has also worked closely with HPO to refine the concept design of the Project and address comments that were raised by HPRB at its December 2012 meeting regarding the Project. The revised concept design was presented to HPRB at its March 7, 2013 meeting. Attached as Exhibit A are copies of HPO’s Staff Report and HPRB’s action regarding the Project. HPO endorsed a number of features of the revised design, including façade articulation, penthouse design, penthouse location, and the ground-level entries and connections to the historic buildings. HPRB unanimously found the concept design to be compatible with the character of the historic buildings and directed the University to continue to work with HPO on the design development of the elevations.

#### **2. Articulation and Detail on the West and East Facades and Color Palette**

As requested by the Commission, the University has further developed the design on the east and west facades of the Project. The revised plans, attached as Exhibit B, reflect the concept design that was endorsed by HPO and HPRB. The revised plans reflect further study, articulation, and detail on all façades including the west and east facades. The west façade now features bay projections that match the proportion of the historic bays and break up the long masonry elevation of the addition. On the east façade, the design utilizes both vertical elements (a glazed slot that marks the elevator lobby) and horizontal elements (shallow recesses in the façade at the upper levels) to provide relief from the addition’s elevation. The revised plans include both full elevations and close-up sections to convey additional detail regarding the design of the Project.

The revised elevations also identify additional refinements to the color palette. The palette of the new construction is a light masonry material with a lighter limestone color for the south and east façade accent areas and a copper color for the bay projections on the west façade. HPO recommended the lighter colors as an effective way to contrast the historic masonry of West End, Schenley and Crawford as well as lighten the mass of the long bar building.

### 3. Penthouse Design and Setback Relief

The revised design also reflects changes to the penthouse that were made in direct response to HPO and HPRB's direction. As explained in the HPO Staff Report, the University reduced the height of the penthouse by three feet and shifted its location to the east. The size of the penthouse was increased in comparison to earlier, preliminary drawings due to the need to house a significant amount of equipment on the roof as well as ducts/fans/vents/etc. which have to be brought into the penthouse. The penthouse will be clad in the same light limestone color of the south and east façade accent areas. HPO and HPRB specifically recommended that the University shift the penthouse to the east side of the addition so that its mass is more integrated and compatible with other elements of the design.

As a result of changes made to accommodate historic preservation concerns, the Project now requires flexibility from the setback requirements of the Zoning Regulations for its entire length along the eastern façade. The University acknowledges that the change in penthouse location does not address Commissioner May's comment at setdown, but the direction received from HPO and HPRB was in direct conflict with Commissioner May's preference for the penthouse to be fully set back along the eastern facade. However, we hope that the Commission will agree with HPO and HPRB that the proposed design, which provides a shorter penthouse with a uniform shape that is successfully integrated into the design of the Project, warrants the requested flexibility.

The Project also requires flexibility from the uniform height requirement of the Zoning Regulations. The overall height of the penthouse screen wall has been lowered to accommodate requests for a shorter penthouse from both HPRB and the Zoning Commission. However, as shown on the attached plans, the elevator core and cooling towers require additional height and will "pop up" above the height of the primary penthouse. The additional flexibility allows for the overall penthouse to appear to be a single, uniform enclosure of equal height yet also accommodates the additional height needed for these critical building elements.

### 4. Building Perspectives

As requested by the Commission, the revised plans include ground-level perspectives that further illustrate the design of the Project and its relationship to the street. The perspectives also illustrate the relationship between the addition and the retained portions of the historic buildings. Finally, the perspectives demonstrate that the proposed penthouse flexibility will not result in adverse visual impacts. The penthouse will not be visible from the south, west, and north. The

penthouse will be perceived in the existing gap between Marvin Center and the Project, but that gap will largely be closed at some future date when the University constructs the planned addition to the Marvin Center that is called for in the Campus Plan / PUD.

## 5. Streetscape Design

The University has worked with staff at OP and DDOT to review and refine the design of the proposed streetscape. As shown on the revised plans, the streetscape design features 9-foot wide sidewalks along both H and I Streets and a continuous 5-foot wide tree box and permeable paver zone between the sidewalk and the curb. Both the tree box and sidewalk zones have been increased in width compared to existing conditions. The design retains the stairs and landscaping around the entrances to the historic buildings and incorporates new ramps that will provide ADA access from the sidewalk to these entrances.

### **B. Student Housing**

The proposed Project will provide up to 898 student beds, which is comparable to other University residence halls such as Thurston Hall (1,103 beds) and Ivory Tower (730 beds). Furthermore, the Project's distinct affinity and traditional residence hall components will further break down the building into three "towers" accessed from separate elevator cores—two affinity towers offering a total of up to 262 beds and a traditional residence hall tower with a total of up to 636 beds.

The University will incorporate faculty and staff apartments into the final project design. Each faculty or staff apartment will reduce the number of student beds depending on the size of each apartment. The University requests flexibility to adjust the size, number, and location of student beds and faculty and staff apartments within the Project depending on programming needs over the life of the PUD.

### **C. Bicycle Parking**

After continued conversations with OP and DDOT, the University has agreed to provide approximately 152 bicycle parking spaces throughout the Project. This includes 112 bicycle parking spaces within the Project (representing a ratio of one bicycle parking space per eight beds, as recommended by DDOT). The interior bicycle parking will be located on both the ground and B1 levels of the Project, as shown on the plans included as Exhibit B. In addition, the Project also proposes a total of 40 bicycle parking spaces in public space in front of the Project on H Street and I Street, as shown on the plans included as Exhibit B.

### **D. Truck Impacts and Loading Management**

The Project includes a shared loading area located between the Project and the Marvin Center. This shared loading area, which is accessed from an existing curb cut off I Street, will

accommodate the service and delivery needs for both the Project and the Marvin Center. In response to concerns raised by ANC 2A and the West End Citizens Association (“WECA”) about impacts related to on-street loading activity, the University has revised its proposed loading management plan so that **all deliveries** will be able to be accommodated in the interior loading area on private space. The University’s proposed Loading Management Plan is included in a supplemental transportation analysis that is attached as Exhibit C.

1. Mail and Package Services

The University’s initial application originally proposed (a) the relocation of the University’s mail and package operations into the Project and (b) the creation of a centralized location for all student mailboxes within the Project. After further evaluation, the University has elected to keep the central processing for mail and package services at its current location on F Street NW. This will notably reduce the number of trucks that will need to access the proposed shared loading and service court between the Project and the Marvin Center. The only new truck trips introduced by the Project are related to its retail component, and the service area will be able to accommodate these deliveries. The reduced truck traffic is discussed in the supplemental transportation analysis attached as Exhibit C.

The University continues to explore the centralization of all student mailboxes within the Project. The University is considering two options for student mail pick up: 1) students would continue to pick up mail at current mail retrieval locations (residence halls and the central mail processing location at the Campus Support Services Building) or 2) students would pick up mail at the new residence hall proposed on Site 77 A. In consideration of Option 2, the Project is located near major campus destinations that include the student center, the library, and major academic buildings, and it is expected that it will be convenient for most students to pass through the Project to pick up their mail on a regular basis. Under this option, student mail would be delivered to the Project from F Street on foot or by University vans. The use of vans can be easily accommodated within the loading area.

2. On-Street Loading Activity

At the ANC 2A meeting regarding the Project, ANC 2A and WECA expressed concerns over the University’s proposed on-street loading space, which was detailed on pages 30-31 of the original transportation study. The University was exploring a potential on-street delivery space to accommodate regular deliveries (e.g. FedEx and UPS) to the Project and the Marvin Center that could not be accommodated within the shared loading area. Due to the fact that Mail & Package Services will no longer be relocated to the new building, the University no longer requests a dedicated on-street loading space to accommodate such deliveries.

Furthermore, in direct response to a request from ANC 2A and WECA, the University will accommodate all deliveries – even special deliveries in trucks over 45 feet in length – within the shared loading area. The University’s original loading management plan limited trucks

within the shared loading area to 45 feet in overall length or less, and required all regular deliveries to be made in trucks that met this size restriction. Special deliveries requiring a larger truck were to be accommodated through temporary no parking zones on an adjacent street to allow for curbside loading.

At the ANC 2A meeting regarding this project, ANC 2A and WECA asked the University to consider to an absolute prohibition on curbside loading in order to reduce the impact of the Project on city streets. After further consideration, the University is able to agree to this limitation. As explained above, all regular deliveries will be made in trucks 45 feet in length or less, and the shared loading area is able to accommodate the turning requirements for these trucks even when the other berths are full. To the extent that special deliveries require a truck that exceeds 45 feet in length, the University will schedule such deliveries during off-peak loading hours when other loading berths are not in use, so that the larger trucks are also able to enter front-first, turn around within the shared loading area, unload, and exit front-first. The dock coordinator that is proposed as a part of the Loading Management Plan will be responsible for coordinating these deliveries.

#### **E. Retail Uses**

The proposed Project on Site 77A will incorporate ground floor retail space along I Street (as well as below-grade retail space), furthering the 2007 Foggy Bottom Campus Plan's goal of creating a dynamic I Street Retail Corridor. As envisioned in the Campus Plan, the proposed retail uses will contribute to the goal of establishing a critical mass of retail extending from the Foggy Bottom-GWU Metro Station, The Avenue (Square 54) to the Shops at 2000 Penn. This effort will be further implemented over time as the ground-floors of other University facilities within the Corridor are redeveloped. The Corridor, including the proposed project, will provide opportunities for a variety of retailers, including small local and "mom and pop" establishments as University retail venues are often smaller in scale and retail rents charged by the University are generally below-market.

The Project contains two retail components. At the ground level, a small retail space of approximately 600-700 square feet is proposed along I Street in the northwest corner of West End. This retail space is anticipated to be a small and primarily public-serving retail use. Although the Campus Plan / PUD exempted this location from the I Street Corridor retail requirements because of historic preservation limitations, the University has proposed a retail component to help activate the public space along the ground level and contribute to the development of the planned I Street Corridor.

The lower level is anticipated to be for student space and retail uses available to both students and the public. This below-grade component of the Project will likely include retail uses such as food service uses, but will not be limited to such services. As shown on the revised plans attached as Exhibit B, the University has revised the Project design to simplify access to the

below-grade spaces. Stairways that are located on axis with the H and I Street entrances provide direct access from the street down to the below-grade component.

All of the proposed retail establishments in 77A will be consistent with the retail uses approved for the I Street Retail Corridor, including those retail uses permitted in the C-1 and C-2 Zone Districts, as limited by 11 DCMR § § 701.1, 701.4, 721.2, and 721.3, with the exception that there shall be no restrictions on fast-food establishments, other than drive-through fast food establishments, which shall be prohibited (2007 Foggy Bottom Campus Plan, Proffer P-11).

As requested by ANC 2A, the University agrees to a commitment of no less than half of the establishments in 77A close no earlier than 9 PM EST. The University understands and agrees with the community's desire for active night-time venues and as such nearly 90% of the existing University-owned retail throughout campus are already open until 9PM or later Monday through Thursday.<sup>1</sup>

Finally, the University remains committed to supporting locally-owned businesses and notes that the campus has a number of retail venues that are leased to locally owned retail establishments. The University has 12 such businesses on campus currently, not including the 15 independent retailers in the university's investment properties.<sup>2</sup> The university remains committed to furthering small locally owned businesses at various locations on its Foggy Bottom campus and will continue its commitment through the implementation of the I Street Retail Corridor.

#### **F. Witness List, Proposed Testimony, and Time Estimate for Presentation**

We look forward to presenting this case to the Commission. The University will provide at least four witnesses to testify on its behalf: a representative of the University, its project architect, its architectural historian, and its traffic consultant. The University will call three of its witnesses, Alick Dearie of Ayers Saint Gross, Andi Adams of Goulston & Storrs, and Jami Milanovich of Wells & Associates, as experts in their respective fields. Mr. Dearie will be called as an expert in the field of architecture, Ms. Adams will be called as an expert in the field of historic preservation, and Ms. Milanovich will be called as an expert in the field of transportation engineering. Resumes for these witnesses are included as Exhibit D. The University anticipates at this time that its presentation will require up to 60 minutes.

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<sup>1</sup> The included weekday hours describe typical school sessions during the fall and spring semester and do not reflect reduced hours during holidays and winter, spring, and summer breaks. The campus retail hours exclude retail located in University-owned investment properties and the University's dining facility within the Marvin Center.

<sup>2</sup> Although the investment properties are located in the proximity of the I Street Retail Corridor, the 2007 Foggy Bottom Campus Plan does not include them in the Retail Corridor. As such, investment property retail leases are not subject to below-market rent.

**G. Conclusion**

The University looks forward to presenting this application at the public hearing on May 20, 2013. If you have any questions regarding this application, please feel free to contact Maureen at 202-721-1101 or David at 202-721-1137.

Sincerely,



Maureen Dwyer



David Avitabile

DA/da  
Enclosures

cc: Charles Barber  
Alicia Knight



**CERTIFICATE OF SERVICE**

On April 30, 2013, I caused a copy of the foregoing letter and enclosure to be delivered by electronic, hand or by U.S. Mail to the following:

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