

FOGGY BOTTOM CAMPUS PLAN / PUD
SQUARE 103 DEVELOPMENT SITE – PHASE I



BY THE GEORGE WASHINGTON UNIVERSITY

APPLICATION TO THE
DISTRICT OF COLUMBIA ZONING COMMISSION FOR
REVIEW AND APPROVAL OF A SECOND STAGE PLANNED UNIT DEVELOPMENT;
MODIFICATION OF A FIRST STAGE PLANNED UNIT DEVELOPMENT; AND
FURTHER PROCESSING APPROVAL OF AN APPROVED CAMPUS PLAN

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EXHIBITS

<u>Description</u>	<u>Exhibit</u>
Compliance with Second-Stage PUD Requirements	Included herein
Architectural Drawings and Elevations, including Tabulation of Development Data, Zoning Map, and Photographs of the Subject Property and Surrounding Area	A
Application Forms	B
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PREFACE

This statement and the attached documents support the application of The George Washington University (“University” or “Applicant”) to the Zoning Commission for second-stage approval of a Planned Unit Development (“PUD”) for the property known as Square 103, Lots 13, 14, 18, 809, 812, 813, 814, 819, and 820 (“Subject Property”). The Subject Property is one of sixteen development sites identified in the University’s First Stage PUD for its Foggy Bottom campus, which was approved by the Zoning Commission in Order No. 06-11/06-12. In addition, the University, on behalf of Educational Foundation Gamma, also requests modification of the first-stage PUD in order to incorporate Lot 18, which was not included in the First Stage PUD in 2006.¹ The University concurrently requests further processing approval for the proposed application under its approved Foggy Bottom Campus Plan, also approved by the Zoning Commission in Order No. 06-11/06-12.

The University intends to develop the Subject Property for academic and administrative uses in two phases. In this phase, the University proposes the development of a below-grade structure containing one level of approximately 23,281 s.f. of academic and administrative program space for the Law School and four stories of underground parking containing approximately 392 parking spaces (the “Project”). As an interim condition, the surface of the Subject Property will contain entrances to the Project, surface parking with approximately 58 additional parking spaces, University loading and service activity, and landscaping. In the second phase, the University will construct the above-ground building, which will be the subject of a future second-stage PUD application and Campus Plan application.

¹ Future amendments to incorporate privately-owned properties within the Campus Plan boundaries later acquired by the University were explicitly contemplated in the First-stage PUD.

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) (the “Comprehensive Plan”), as well as numerous goals and policies of the District of Columbia. This project will benefit the District by implementing many of the public benefits and project amenities outlined in the Campus Plan / PUD, including sustainable design elements in new construction, streetscape improvements, extensive landscaping, and dispersal of parking throughout campus in underground parking facilities.

Submitted in support of this application are completed application forms, a copy of the notice of intent to file a PUD that was 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. Also submitted are the materials that the University is required to file with each second stage application. As set forth below, this statement and the attached documents meet the filing requirements for a PUD application under Chapter 24 of the District of Columbia Zoning Regulations.

I. INTRODUCTION

A. *Summary of Requested Action*

This document supports the application of The George Washington University (“University” or “Applicant”) to the Zoning Commission for the District of Columbia (“Commission”) for second-stage approval of a Planned Unit Development (“PUD”) for the property known as Square 103, Lots 13, 14, 18, 809, 812, 813, 814, 819, and 820 (“Subject Property”). The Subject Property is one of sixteen development sites identified in the University’s approved Campus Plan and First Stage PUD for its Foggy Bottom campus, which were concurrently approved by the Zoning Commission in Order No. 06-11/06-12 (hereinafter, the “Campus Plan / PUD”). In addition, the University, on behalf of Educational Foundation Gamma, also requests modification of the first-stage PUD in order to incorporate Lot 18, which was not included in the First Stage PUD in 2006.² Finally, the University requests further processing approval for the proposed application under its approved Campus Plan.

The Subject Property consists of approximately 38,328 s.f., or approximately 0.86 acres, of land area and currently contains a number of structures and related surface parking devoted to a mix of University-related uses. The University will demolish the existing structures and develop the Subject Property for academic and administrative uses in two phases. In this phase, the University proposes the development of a below-grade structure containing one level of approximately 23,281 s.f. of academic and administrative program space for the Law School and four stories of underground parking containing approximately 392 parking spaces (the

² The University is the contract purchaser for Lot 18 and is authorized to secure such zoning approval. Future amendments to incorporate privately-owned properties within the Campus Plan boundaries later acquired by the University were explicitly contemplated in the First-Stage PUD.

“Project”).³ As an interim condition, the surface of the Subject Property will contain entrances to the Project, additional surface parking with approximately 58 additional parking spaces, University loading and service activity, and landscaping. The total gross floor area included in the Project is approximately 7,430 square feet for a total Floor Area Ratio (“FAR”) of approximately 0.19 and a lot occupancy of approximately 19%.

This second-stage PUD will provide additional underground parking for the University that is necessary in order to permit the future demolition of the above-ground University Parking Garage and related decentralization of University parking, which is an important component of the Campus Plan. The PUD will also prepare the site for the future development of a new infill building to be approved through a future second-stage PUD. In the interim, the PUD will provide an attractive and sustainable improvement to the campus and surrounding streetscape. The PUD will also incorporate sustainable design features intended to minimize stormwater runoff and encourage its reuse.

The Subject Property is currently located in the R-5-D Zone District, and in the Institutional Land Use category on the Future Land Use Map. The Applicant will use the PUD process to achieve relief from the rear yard requirements of the Zoning Regulations in order to accommodate the proposed design.

B. The Applicant

With the exception of Lot 18, the Subject Property is controlled 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

³ In the second phase, the University will construct the above-ground building, which will be the subject of a future second-stage PUD application.

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.

Lot 18 is currently owned by Educational Foundation for Gamma Eta, Inc. (“EFG”), a District of Columbia non-profit corporation and an affiliate of the Delta Tau Delta (“DTD”) Fraternity. DTD was founded in 1858 at Bethany College in present-day West Virginia. Born of the knowledge that integrity is essential, the founding principles of Truth, Courage, Faith and Power have provided a guide for its membership. Since 1858 the Fraternity has spread to over 200 campuses with 125 active chapters and colonies comprised of over 7,000 undergraduate members. In 150 years more than 150,000 men have become members of DTD. The University and EFG have agreed to exchange Lot 18 for other property on the Foggy Bottom campus located at 524-526 22nd Street NW. EFG will then use 524-526 22nd Street as a fraternity, which is consistent with the site's designation as residential/campus life under the approved Campus Plan / PUD.

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

Consistent with the goals of the District as outlined in the Land Use Element of the Comprehensive Plan as well as the goals of the approved Foggy Bottom Campus Plan, the University intends to redevelop the Subject Property to provide underground parking that will permit the future demolition of the above-ground University Parking Garage and decentralize the

University's parking supply. While the University does not seek approval for the above-grade improvements for the Property at this time, it does seek to create an attractive and sustainable interim condition on the surface of the site that will also provide streetscape improvements and is compatible with the Foggy Bottom campus and surrounding neighborhood.

The PUD process outlined in Chapter 24 of the Zoning Regulations, in conjunction with the campus plan process outlined in Section 210 of the Zoning Regulations, serve as the appropriate means of achieving the above objectives, because they provide 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 Applicant intends to start excavation of the Property in November 2010 and expects that the construction period will last approximately 18-20 months.

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

The Foggy Bottom campus is generally located in the R-5-D Zone District.⁴ As such, university use is permitted pursuant to Section 210 of the Zoning Regulations, which permits college and university uses in residential zone districts provided that a campus plan has been approved for the campus. In Order No. 06-11/06-12, 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 plan calls for increased density targeted at specific development sites within the campus boundaries that are concentrated towards the core of the campus, away from residential areas. The additional space is required to further 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 sixteen development sites referenced in the campus plan as future second-stage PUD projects, and 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

⁴ Portions of the Campus are located in the R-5-E, SP-2, and C-3-C Zone Districts either as the underlying zone district or through a PUD-related Map Amendment.

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.

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:

- Condition P-7: Advisory Committee. The University formed the Advisory Committee on in 2007 and invited ANC 2A to select five representatives of the community, as provided for in Condition P-7 of the Campus Plan / PUD Order. The first meeting was held on December 14, 2007, and since that time, meetings have been held quarterly both to provide updates on University initiatives and solicit feedback and comments on issues or concerns. While ANC 2A has not yet designated its representatives to the Advisory Committee, members of the community, including members of the West End Citizens Association, have regularly participated at each meeting.
- Condition P-8: Off-Campus Commitments. Consistent with its commitment to transition off-campus properties away from use as housing for undergraduate students, the University ceased the use of the Hall on Virginia Avenue, Columbia Plaza, and the Aston, located at 1129 New Hampshire Avenue, NW, as housing for undergraduate students. The Hall on Virginia Avenue is now used for graduate student housing, Columbia Plaza has been removed as an option for GW undergraduate students⁵ and, the Aston was renovated to provide housing for law school students.

Condition P-9: Historic Preservation Plan. On November 2, 2009, the University completed the applications for the designation of six properties within the Foggy Bottom campus as individual historic landmarks. The Historic Preservation Review Board considered these applications at a public hearing on January 28, 2010 and voted to

⁵ As of August 1, 2008, full time Foggy Bottom undergraduates were no longer assigned to Columbia Plaza. Twenty-two full time undergraduates, however, were residents of Columbia Plaza under the GW student housing program prior to August 1, 2008 and, pursuant to Condition P-8 of the 2007 Foggy Bottom Campus Plan, were permitted to remain residents of Columbia Plaza until they graduate.

designate all six properties as landmarks under the Historic Landmark and Historic District Preservation Act of 1978. On November 2, 2009, the University also provided the Historic Preservation Office with the documentation for the proposed Foggy Bottom campus historic district. GW continues to cooperate with HPO on the preparation of the application for the historic district and, pending the formal approval of the district under the Act, the University has and will continue to consult with HPO staff, as appropriate, on exterior modifications to buildings anticipated to be contributing to this proposed historic district.

Condition P-10: Streetscape Improvements. Starting in March 2009, the University re-engaged EEK Architects (the planners who prepared the Campus Plan / PUD) to redevelop proposals for a master plan to implement the streetscape components of the Campus Plan / PUD. The University met with representatives of the community as well as DDOT, OP, and other District agencies to solicit feedback on the plan, including two community meetings in May and June 2009. Following a Preliminary Design Review Meeting with representatives of multiple District agencies and disciplines in September 2007 and again in December 2009, the University incorporated DDOT and neighborhood comments into a revised Streetscape Plan, which was submitted to DDOT in August 2010. The University is also developing permitting and maintenance agreements for incorporating and maintaining components in public space.

To date, the University has completed streetscape improvements throughout Square 80 and is currently constructing streetscape improvements on Square 54 and the Smith Center on Square 57 .

- Conditions P-11 & P-12: I Street Retail Corridor. To date, none of the development sites along I Street have been redeveloped. As the University evaluates potential development options for these sites, it will endeavor to provide the required retail uses.
- Condition P-13: Sustainable Development. The University has actively pursued sustainable design initiatives that exceed its baseline commitments under the Campus Plan / PUD and similar zoning approvals. For example, the recently completed South Hall in Square 80, which was approved by the Zoning Commission in Z.C. Order No. 06-17, earned LEED Gold Certification.

Nearby in the same square, the University recently completed the conversion of a 32,010 square-foot surface parking lot into an open and green space. The new campus amenity features more than 20 trees, an activity lawn, trellised seating, and several small landscaped areas. The site is planted with native and adapted plantings that require minimal watering, and is designed to contain and reuse all stormwater that falls on site via three cisterns for water collection, runnels to direct stormwater from impervious surfaces into treeboxes, and introduced use of pervious paving surfaces. The space opened in April 2010 and is available for use by members of the GW and Foggy

Bottom/West End communities. This project was selected as a pilot project by the Sustainable Sites Initiative.⁶

As discussed in greater detail below, the proposed PUD is a key part of the University's planned construction of underground parking dispersed throughout the Foggy Bottom campus, which is another key amenity and benefit of the approved Campus Plan / PUD.

The University has also moved forward with the implementation of other renovation projects and improvements to its Foggy Bottom campus. In 2009, the University completed the renovation of the former Alumni House at 1925 F Street as the new home for the University president, Steven Knapp. The University is currently renovating the Charles E. Smith athletic center through a multi-phase construction project that is expected to be completed in 2011 and includes streetscape improvements consistent with the Campus Plan / PUD. Finally, the construction of the mixed-use office, residential, and retail development at Square 54 (the old GW hospital site) approved by the Commission in Z.C. Order 06-27 is well under way and expected to be completed in 2011.

⁶ The Sustainable Sites Initiative (SITES) is an interdisciplinary effort by the American Society of Landscape Architects, the Lady Bird Johnson Wildflower Center at the University of Texas at Austin, and the United States Botanical Garden to create voluntary national guidelines and performance benchmarks for sustainable land design, construction, and maintenance practices.

III. THE PROPOSED PUD PROJECT

A. *Site Location*

The Subject Property consists of approximately 38,328 s.f., or approximately 0.86 acres, of land area, and is located along G Street, NW between 20th Street NW and 21st Street NW. A 16-foot wide public through alley runs along the rear of the Subject Property. The Subject Property is currently improved with five structures that include space for academic / administrative uses as well as residential / campus life uses and 93 surface parking spaces.

To the west of the Subject Property is the former Quigley's pharmacy, which is currently used as a neighborhood restaurant and bar. To the east of the Subject Property are three townhouses owned by the University all to be retained as part of the Historic Preservation Plan, including the Underwood House at 2000 G Street, which is a designated historic landmark. Across the public alley to the south are properties owned by University and devoted to miscellaneous University uses, including Francis Scott Key Hall, an 86-foot residence hall, and Potomac House, a 90-foot residence hall approved by the Commission as a PUD in Order No. 03-29. Across G Street to the north are properties owned by the University that include Woodhull House and the Old President's House at 2003 G Street, which are both designated historic landmarks.

The Subject Property is located in the University's Foggy Bottom campus, which is bounded by the Foggy Bottom and West End neighborhoods as well as the Golden Triangle Business Improvement District and the Central Business District. The University provides a natural transition between the lower-scale residential communities and densely-developed commercial areas. The Foggy Bottom-GWU Metrorail station is located approximately 4 blocks

to the northwest of the Subject Property, and both Metrorail and the DC Circulator provide regular bus service around the campus.

The Subject Property itself is located in the R-5-D Zone District, and the surrounding property is also located in the R-5-D Zone District. Property further to the northeast is located in the C-3-C Zone District. Property further to the southeast is located in the SP-2 Zone District, and property further to the south and southwest is located in the R-5-E Zone District.

B. Project Description

The Subject Property is one of sixteen approved development sites for the Foggy Bottom campus. The Campus Plan / PUD approved the construction of an academic/administrative building along with underground parking spaces. In this application, the University seeks permission for the first phase of the University's planned development of the Subject Property, which will consist primarily of the below-grade improvements to the site. The University has proposed bifurcating the development of the Property into two phases in order to bring forward the construction of underground parking on the site that will help to facilitate the University's planned elimination of the University Parking Garage. (The University will apply for further second-stage approval of the second phase – the planned building for the Subject Property – in a future application.)

As shown on the architectural plans, elevations, and drawings attached as Exhibit A, the Project consists of five stories of below-grade improvements, including one story containing approximately 23,281 s.f. of program space for the Law School and four stories of underground parking containing approximately 392 parking spaces (the "Project"). In addition, as a part of the Project, the University will construct a series of surface improvements. These improvements will include the construction of an entry pavilion to provide access to the Law School space and

the underground parking garage, emergency egress exits, mechanical wells for HVAC equipment, and a roof over the garage entry ramp. The surface improvements will also include approximately 58 additional parking spaces, an area for loading and service activity, a covered bicycle storage facility, and landscaping that includes usable green space.

The main pedestrian access to the Law School space and the below grade garage will be through an entry pavilion positioned on the north side of the site, across from the existing Law School building on G Street. The pavilion's simple, rectilinear form is designed to foster a sense of openness aided by its lightweight structure and transparency. Metal panels will bookend the glass curtain walls which face east and west. A broad canopy will extend above the west side of the entry pavilion. This trellis structure, consisting of painted aluminum elements on a slender steel frame, will create a modern style portico sheltering the entry point to the pavilion and the broad paved plaza, thus providing a transition from the outdoors to the interior space. A new campus green space west of the plaza will provide a gathering point for the passive enjoyment of nature. The pavilion's flat roof will feature a green roof and skylight(s) that will help filter light down to the Law School space.

The landscape design along the streetscape complies with the Foggy Bottom Campus Streetscape Plan. On G Street, the tree pits will be widened to 6' wide, the sidewalks will be widened to 8' wide, and there will be a landscaped zone between the sidewalks and property line. The landscaped zone will include small trees, shrubs, and groundcovers. A small seating area at the east end of the Project will enclose the landscape zone. In order to comply with the Streetscape Plan, the sidewalk will be replaced with brick pavers along G Street. The landscape around the entry plaza will provide an open lawn area to serve as a gathering place for students, faculty, staff and visitors. This lawn area will have low earthwork mounds to create an

interesting, varied landscape. The entry plaza in front of the pavilion will consist of stone pavers. Plantings around the loading dock and surface parking, including ornamental grasses and shrubs will screen vehicles.

The Project also includes sustainable features that continue the University's commitment to the use of innovative sustainable design practices. The Project will meet GW's commitment to at least 16 points under LEED 2.2, but is targeting a Silver Rating in the USGBC's LEED 2009 for New Construction Rating System. The Project is being designed to improve energy performance by 22%, utilize regional materials, materials with recycled content, and low-emitting materials. Construction waste will be reduced by 75% by recycling or salvaging materials. The Project will include dedicated parking spaces with charging stations for electric cars, feature extensive open space, capture all site stormwater runoff, and reduce heat island effect caused by roof and non-roof areas. A greywater system for harvesting and reuse of rainwater is incorporated into the design and water usage is designed to be reduced by 35% with no potable water usage for irrigation.

The landscape design incorporates a number of sustainable features. On-site stormwater will be harvested in a 6,000 gallon above-ground cistern. This stormwater will be filtered and used for irrigation. An underground stormwater tank will collect additional stormwater from the balance of the site. In addition to meeting the stormwater quality and quantity requirements, this underground tank will provide supplementary water to meet the water closet needs. Finally, the pavilion will have a sedum greenroof which will help minimize stormwater run-off.

Vehicular entry will be off the public alley located at the rear of the Subject Property. In order to facilitate vehicular access the University will set aside private land that effectively widens the public alley from 16 feet to 20 feet. Pedestrian access, by contrast, will be from G

Street via a plaza adjacent to the entry. The site will also provide ample amounts of covered bicycle parking, both in a surface facility and in the garage below.

C. Development Parameters Under the Approved First-Stage PUD

On the Subject Property, the Campus Plan / PUD authorized the construction of a new building devoted to academic and administrative uses with a height of 80 feet, lot occupancy of 90%, and gross floor area of 185,983 square feet. The Campus Plan / PUD also called for approximately 307 net new parking spaces on the site in an underground parking facility.

The total gross floor area included in the Project is approximately 7,430 square feet for a total Floor Area Ratio (“FAR”) of approximately 0.19 and a lot occupancy of approximately 19%. The entry pavilion and other structures will have a maximum height of approximately 28 feet. In total, the Project will provide approximately 392 new spaces in the underground garage (or 299 net new spaces), as well as 58 additional interim surface parking spaces, for a total of approximately 450 parking spaces.

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. The PUD regulations specifically allow the Zoning Commission to approve any zoning relief that would otherwise require approval of the BZA. In this case, the University requests relief from the rear yard requirement of the Zoning Regulations. Section 404.1 of the Regulations mandates a minimum 15-foot rear yard for structures in the R-5-D Zone District. Here, however, some of the above-ground portions of the structure will be located approximately 12’8” from the rear property line in order to provide enough distance for the vehicle ramp as it makes its way down to the first level of parking and

provide for efficient locations for egress stairways. The Regulations explicitly permit the Commission to “approve yards or courts greater or lesser than the normal requirements, depending upon the exact circumstances of the particular project.” See 11 DCMR § 2405.5.

Additionally, as noted on the attached plans, the below-grade structural improvements associated with the first phase of construction assume that the rear yard for the second phase of development – the above-ground academic building that will come before the Commission in a future second-stage PUD application – will continue to maintain the 12’8” rear yard and require relief from the rear yard requirement.⁷ With such a setback, the building would still adhere to the 90% lot occupancy guideline for the development site, which is appropriate given the proposed academic/administrative use for the future building. Furthermore, since the entire square is owned by the University, the only property owner impacted by the relief will be GW.

⁷ A hypothetical 80-foot building would require a minimum rear yard of 26.66 feet.

IV. PLANNING ANALYSIS

A. *Land Use Impact*

As detailed in Section V, the proposed PUD project is fully consistent with the goals and policies of the Comprehensive Plan for the District of Columbia. Furthermore, the PUD represents the first phase of the redevelopment of an underutilized site on the Foggy Bottom campus to create new program space for the Law School, consistent with the goals of the approved Campus Plan regarding the provision of new academic and administrative space on the Foggy Bottom campus. The PUD also provides new underground parking spaces as well as additional interim parking spaces, consistent with the goals of the Campus Plan regarding the dispersal of parking across the campus and the accommodation of interim parking in order to facilitate that dispersal. The PUD will have a positive land use impact that is consistent with the Comprehensive Plan and other planning goals of the District of Columbia.

B. *Zoning Impact*

The proposed Project is consistent with the Commission's prior Campus Plan / PUD approval in Zoning Commission Order No. 06-11/06-12. The proposed use by the Law School is consistent with the Commission's approval of academic and administrative uses for the development site. Furthermore, the height, gross floor area, and lot occupancy of the Project are well within the approved height, GFA, and lot occupancy. Finally, the proposed parking is consistent with the Commission's first-stage approval. The Campus Plan / PUD called for approximately 307 net new parking spaces on the site in an underground parking facility, and the proposed Project will provide approximately 299 net new parking spaces in the underground garage. As discussed in greater detail below, the Campus Plan / PUD also called for the interim use of additional sites for parking while existing parking facilities are being redeveloped as well

as the use of attendant parking to meet parking demand, and the proposed additional 58 surface parking spaces are therefore also consistent with the first-stage approvals.

The proposed use of the surface of the Property for additional interim surface parking is not inconsistent with the Commission's prior Campus Plan / PUD approval. As noted above, one of the goals of the Campus Plan is to redevelop the University Parking Garage ("UPG") in Square 55, eliminate surface parking lots, and disperse parking into several underground lots throughout the Foggy Bottom campus. However, in order to take the UPG offline for redevelopment of Square 55, the University must offset the loss of its central parking supply with other parking facilities. Many of these spaces will be offset with new underground parking facilities that have already or are scheduled to come online. However, as recognized by the University in the campus plan, additional flexibility would be required to ensure that the University would continue to meet parking demand for the campus and maintain the required minimum of 2,800 parking spaces. To this end, the Commission approved the provision of additional spaces through other interim measures, such as off-campus parking resources or the utilization of attendant parking at various campus facilities.

Here, the proposed interim use of the Square 103 surface for additional attendant parking represents an effort to balance the desire to disperse parking across campus into underground garages with the need to ensure the provision of adequate off-street parking supply while development is sequenced across the campus. The University will soon remove nearly 1,500 parking spaces from the existing campus parking supply through near-term redevelopment projects that include the elimination of the UPG. While new underground parking facilities, such as the new parking garage under South Hall (180 spaces), the 362 parking spaces devoted to University use in Square 54, or the underground garage called for in this application (392 spaces)

will partially offset the loss of parking, more spaces are required to fully meet demand until additional underground parking spaces can be completed.

Therefore, the University has proposed the interim use of Square 103 for surface parking until such time as the University is ready to move forward with the above-ground building improvements. As shown on the attached plans and described in detail above, the University has sensitively landscaped the Subject Property in order to minimize the visual impact of the parking lot and integrated significant sustainable features to manage stormwater runoff and other effects. The proposed improvements will transform the currently 100%-impervious surface into a sustainable site that contains a mix of green roof and pervious paving. The improvements will also permit the on-site capture of all stormwater runoff and encourage its reuse.

C. *Environmental Impact*

As more specifically detailed in Exhibit F, no adverse environmental impact will result from the construction of the Project. Consistent with the University's emphasis on leadership in sustainable design, the proposed improvements will incorporate a series of sustainable features that will minimize the impact of the redevelopment. The Project will replace a site that is 100% impervious with landscaped areas and permeable paving that will cover 24% of the site and effectively function as a green roof over the below-ground improvements and aid in the collection and filtration of stormwater. Furthermore, all stormwater runoff will be captured and reused. Other sustainable design features include stormwater management tanks under the parking ramp and an above-ground cistern as well as surface drains that will allow for greywater reuse on the Subject Property. These sustainable features have been designed to meet the goal of reusing all stormwater on the property and have been sized to anticipate the needs for the future building on the development site. These proposed stormwater management features will be

combined with other sustainable design features, such as water-efficient landscaping that will require no potable water use or irrigation for watering, to minimize the Project's environmental impact.

D. Facilities Impact

The proposed Project will not have an adverse impact on the facilities that it will rely on for service. The Foggy Bottom Metrorail station as well as numerous Metrobus lines—and the DC Circulator—all service the Foggy Bottom campus, and it is expected that students, faculty, staff, and visitors will continue to use public transit. The Project will also improve the campus' bicycle facilities through the provision of covered bicycle storage both on the surface and in the parking garage, which will promote the expanded use of cycling as an alternative to driving.

V. PUD EVALUATION STANDARDS

A. *Second-Stage Application Filing Requirements*

This application complies with the process and requirements set forth in Chapter 24 of the Zoning Regulations for review of a second-stage PUD application. Specifically, this application complies with the requirements of Section 2406.12 as follows:

- Area Requirement. The first-stage PUD encompasses approximately 1,669,744 square feet of land area, which exceeds the minimum area requirement of 15,000 square feet for a PUD in the R-5-D, R-5-E, C-3-C, and SP-2 Zone Districts.
- Notice. As stated on the certification attached as Exhibit D and as required by Sections 2406.7 to 2406.10 of the Zoning Regulations, the University provided notice of its intent to file a 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 first-stage PUD.
- Section 2406.12(a). The completed application form is included in Exhibit B of this submission, along with an application to modify the first-stage PUD and application for further processing of an approved campus plan.
- Section 2406.12(b). This statement provides detailed information on the location, number, size, and types of uses to be located in the project.
- Section 2406.12(c)-(f). Included in Exhibit A are plans, elevations, and sections that include a detailed site plan; detailed landscaping and grading plan; floor plans, elevations, and sections of the project as well as sections and elevations of the entire square in relationship to the project; and a final detailed circulation plan.
- Section 2406.12(g). This statement includes a narrative description of the project and its related features and impacts.
- Section 2406.12(h). This statement addresses the consistency of the application with the intent and purposes of the Zoning Regulations, the PUD process, and the first-stage approval of the Campus Plan / PUD.

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 are 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 proposed Project is located on the approved Square 103 development site, and is consistent with the use, zoning, GFA, lot occupancy, and height for that development site. This application represents the first phase of the University's planned improvements for the site, and the University will return to the Zoning Commission for additional second-stage approval of the above-ground improvements at a later date.
- Condition P-15: Satisfaction of Further Processing Standards. As discussed in Section VI below, the University has satisfied its burden of proof under Sections 210 and 3104 of the Zoning Regulations.
- 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, including the use, zoning, height, gross floor area, and lot occupancy limitations for the Square 103 development site.
- 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 has been designed to be compatible with adjacent and nearby properties. Vehicular access is provided via the existing public alley system, and the proposed surface improvements are intended to create an attractive, sustainable, landscaped addition to the G Street streetscape. Note that the adjacent properties as well as properties across G Street to the north and beyond the public alley to the south are all owned by the University.
- Condition P-16(c): Interim Leased Space for Activities Either Displaced by Construction or Intended to be Located Permanently in the Completed Structure. No interim leased space will be required for the university uses displaced by construction. The beds currently provided by the University on the Property are offset by the addition of other beds on campus through the recent completion of South Hall, and the academic and administrative uses currently located on the site will be accommodated elsewhere on campus. The beds provided by EFG will be relocated to the fraternity's new property at 524-526 22nd Street, which is also located within the boundaries of the Campus Plan and designated for residential/campus life use.

Some interim leased space may be required to accommodate the parking spaces that will be displaced by construction of the proposed improvements, depending on the precise sequence of redevelopment of Square 103 with other proposed development sites. The University is currently working to finalize the sequencing and identify opportunities for interim leased parking spaces to accommodate parking demand and ensure the minimum requirement of 2,800 off-street parking spaces are provided.

- Condition P-16(d): FAR Report. As detailed in the report attached as Exhibit I, the University's existing FAR within the Foggy Bottom campus plan boundaries is 3.23, including buildings that are currently under construction within the campus. Upon completion of the proposed improvements as well as all other improvements currently under construction, the University's FAR on the Foggy Bottom campus will be 3.21. 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 Fall 2009 Compliance Report is attached as Exhibit J and demonstrates full compliance with the approved Campus Plan.
- Condition P-16(f): Streetscape Plan Implementation Progress Report. As detailed on the progress report attached as Exhibit K, the University has worked with DDOT, OP, and other District agencies, as well as community representatives, to finalize its master plan for implementation of streetscape components of the Campus Plan / PUD. To date, the University has completed streetscape improvements throughout Square 80 and is currently constructing improvements surrounding Square 54 and the Smith Center on Square 57.
- Condition P-16(g): Off-Street Parking Space Census. As of August 2010, the University provided 3,084 off-street striped parking spaces within the campus plan boundaries. The University is able to provide an additional 667 off-street striped parking spaces through the use of attendant parking, for a total of 3,751 off-street parking spaces. The Project will require the closure of Lot A/Support Building (highlighted in the chart below) and will result in the temporary loss of 93 parking spaces during the construction of this project, resulting in 3,658 parking spaces. Upon completion of this project, the University will add approximately 392 below grade and 58 above parking spaces for a new total of 4,108 parking spaces. A full accounting of the number of off-street parking spaces is attached as Exhibit L.
- Condition P-16(h): Transportation Management Program Status Report. Led by its Transportation Management Coordinator, the University has implemented a comprehensive transportation management plan to promote alternatives to driving and eliminate adverse traffic and parking impacts. As detailed on the status report attached as Exhibit M, the University has successfully publicized and promoted transportation alternatives. Most significantly, University participation in pre-tax Metro SmartBenefits has increased by 15%, to 1,100 participants, since 2007. In addition, University participation in the ZipCar program has increased significantly; the University has doubled the number of GW-affiliated Zipcar memberships to nearly 3,000, including students, faculty, staff, and alumni, and 19 Zipcars are now present on and adjacent to the

Foggy Bottom campus. The University's efforts to promote transportation alternatives recently received Honorable Mention at the Commuter Connections 2009 Employer Recognition Awards.

- Condition P-16(i): Advisory Committee Consultation. Starting as early as June 2008, the University notified the Advisory Committee of its intent to develop the Square 103 development and described its intent to construct the second-stage PUD as a phased project, with the below-grade parking first and the above-grade building following at a later date. The University presented the Square 103 PUD project to the Advisory Committee at a regularly-scheduled meeting on March 4, 2010 (the tenth quarterly meeting of the Advisory Committee). 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 second-stage PUD 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 N. The University also discussed the project with the Foggy Bottom Association's March 30, 2010 meeting, and with ANC 2A at the ANC's regularly-scheduled March 2010 public meeting.

The University provided additional information to the Advisory Committee at its June 7, 2010 public meeting, and expects to 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 approval of the Campus Plan / PUD, 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

Section 2403.9 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 second-stage application will achieve the goals of the PUD process by implementing many of the benefits and amenities called for in the first-stage PUD, including exemplary design and

planning, streetscape improvements and enhancements to the public space, vehicular and pedestrian improvements and transportation demand management measures, and environmental benefits.

1. Urban Design, Architecture, and Landscaping

Section 2403.9(a) lists urban design, architecture, and landscaping as categories of public benefits and project amenities for a PUD. As shown on the detailed plans, elevations, and renderings included in Exhibit A, the proposed project exhibits many characteristics of exemplary urban design, including use of high-quality materials, pedestrian-oriented landscape and hardscape improvements, clear separation of pedestrian and vehicular entrances and circulation patterns, inclusion of features that promote alternatives to driving, and sustainable features. The improvements to the site, even under the interim condition, will represent a significant improvement to existing conditions.

2. Site Planning, and Efficient and Economical Land Utilization

Pursuant to Section 2403.9(b) of the Zoning Regulations, “site planning and efficient and economical land utilization” are public benefits and project amenities to be evaluated by the Zoning Commission. The site currently contains low-scale buildings with large amounts of surface parking and driveways that fail to fully capitalize on the site’s transit-oriented location four blocks from Metrorail and central location within the Foggy Bottom campus. The proposed project represents the first phase of the redevelopment of this infill site, and the proposed parking spaces will help the University to implement the dispersal of parking that was one of the key site planning goals of the Campus Plan.

3. Effective and Safe Vehicular and Pedestrian Access and Transportation Management Measures

The Zoning Regulations, pursuant to Section 2403.9(c), state that “effective and safe vehicular and pedestrian access” can be considered public benefits and project amenities of a PUD. The proposed project will use the existing through alley to provide access to both the underground and interim surface parking, ensuring no curb cuts will be made along the public streets and separating vehicular traffic from pedestrian traffic on the site. The project also includes secured bicycle storage both on the surface and in the garage. Most importantly, the project will facilitate the dispersal of parking throughout the Foggy Bottom campus. As DDOT explained in a supplemental report in support of the Campus Plan / PUD: “Multiple entry points into a traffic network service [will relieve congestion by reducing] the volume of traffic during a particular period of time by distributing the impact compared to a single entry point. Therefore the impact on any one location is lessened.” DDOT Report, January 4, 2007 at 3.

Gorove/Slade Associates, Inc., the traffic and parking engineers for this project, have prepared a traffic assessment, attached as Exhibit H. Based on their findings, the proposed project is consistent with the transportation and parking goals of the Campus Plan / PUD regarding dispersal of the University’s parking supply into underground parking garages, promotion of the University’s Transportation Management Plan initiatives, and continued maintenance of the required minimum number of parking spaces. Gorove/Slade concluded that all surrounding intersections will continue to operate at acceptable levels of service in the future with the proposed development, which will not negatively affect either commuter-based or local neighborhood traffic in the vicinity of the site. Furthermore, the proposed PUD will not have any negative impacts on pedestrian and bicycle conditions.

4. Environmental Benefits

Section 2403.9(h) states that environmental benefits are considered to be public benefits and project amenities of a PUD. As described above, the Project will provide a number of sustainable improvements to the site that will both ensure the interim condition and the future building achieve superior levels of sustainability. Specifically, the Project will replace a site that is 100% impervious with landscaped areas and permeable paving that will cover 24% of the site and effectively function as a green roof over the below-ground improvements and aid in the collection and filtration of stormwater. Other sustainable design features include stormwater management tanks under the parking ramp and an above-ground cistern as well as surface drains that will allow for greywater reuse on the Subject Property. These sustainable features have been designed to meet the goal of capturing and reusing all stormwater on the property, which exceeds the current requirements of the stormwater management regulations and provides on-site storage, infiltration, treatment and detainment of runoff, and these elements have been sized to anticipate the needs for the future building on the development site. These proposed stormwater management features will be combined with other sustainable design features, such as water-efficient landscaping that will require no potable water use or irrigation for watering, to minimize the Project's environmental impact.

5. Comprehensive Plan

According to Section 2403.9(j), public benefits and project amenities include “other ways in which the proposed planned development substantially advances the major themes and other policies and objectives of any of the elements of the Comprehensive Plan.” As described in greater detail in Section VII, the PUD is consistent with and furthers many goals and policies of the Comprehensive Plan.

VI. FURTHER PROCESSING EVALUATION STANDARDS

A. *College or University which is an Academic Institution of Higher Learning*

The George Washington University was chartered as an educational institution of higher learning by act of Congress dated February 9, 1821.

B. *The Use is Located so that it is Not Likely to Become Objectionable to Neighboring Property*

For the reasons set forth below, the University's proposed use of the Subject Property is not likely to become objectionable to neighboring property.

1. Noise

As discussed in detail during the Campus Plan / PUD process, activities within the Campus Plan boundaries are located and designed to minimize objectionable impacts on the neighboring community. In the Campus Plan / PUD Order, the Commission concluded that the University's student conduct initiatives intended to minimize noise generated by its student population were appropriate and effective in avoiding objectionable impacts due to noise. Order at 8-9 (FOF 34-35). As detailed in the attached Compliance Report, the University has continued to maintain and refine these measures to address these potential impacts. Furthermore, new facilities in the Campus Plan have been focused primarily internal to the campus and away from surrounding residential neighborhoods, which will minimize noise impacts. The proposed project furthers these goals by locating pedestrian entrances and activity along G Street within the campus and locating loading and service areas within the block off the public alley and away from neighborhood streets.

2. Traffic

In the Campus Plan / PUD Order, the Commission concluded that the existing and future levels of service surrounding the Foggy Bottom campus were acceptable and that the University

would not impose objectionable traffic impacts provided it continued to implement transportation management measures. Order at 9-10 (FOF 39-42). As discussed above, the University has continued to maintain and supplement its TMP measures to minimize traffic impacts.

Consistent with the approved Campus Plan / PUD, the proposed project will not impose objectionable traffic impacts. The site plan makes use of the existing through alley to provide access to both the underground and interim surface parking, rather than add curb cuts along the public rights-of-way. The project also includes secured bicycle storage both on the surface and in the garage as a part of the University's TMP initiatives. Gorove/Slade Associates, Inc., the traffic and parking engineers for this project, concluded that all surrounding intersections will continue to operate at acceptable levels of service in the future with the proposed development, which will not negatively affect either commuter-based or local neighborhood traffic in the vicinity of the site. Furthermore, Gorove/Slade has concluded that the proposed PUD will not have any negative impacts on pedestrian and bicycle conditions.

3. Parking

In the Campus Plan / PUD Order, the Commission found that the Campus Plan would not create objectionable conditions due to parking because the University planned to maintain an adequate minimum number of parking spaces on campus and did not propose any increase in the number of faculty and staff above the previously approved levels. Order at 10 (FOF 43-45). The Commission also found that the University's proposed dispersal of parking to underground garages would generate positive environmental, site utilization, pedestrian, and traffic impacts. Order at 15-16 (FOF 65(e)).

Here, the proposed improvements will not create objectionable conditions due to parking. The proposed project is consistent with the transportation and parking goals of the Campus Plan / PUD regarding dispersal of the University's parking supply into underground parking garages. Furthermore, the University will continue to maintain the minimum required number of parking spaces.

4. Number of Students or Other Objectionable Conditions

As described by the Commission in the Campus Plan / PUD Order and reaffirmed in its most recent Order on Remand, the Commission found that the Campus Plan would not create objectionable conditions due to the number of students.

C. Compliance with the Maximum Bulk Requirement

The property within the Campus Plan boundaries is zoned R-5-D, R-5-E, SP-2, and C-3-C, and the rezoning of certain sites to C-3-C and C-4 has been approved in conjunction with the first-stage PUD. As affirmed by the Zoning Commission in the Campus Plan / PUD Order, the Zoning Regulations limit the permitted development in the residentially-zoned portions of a campus to be aggregated to a total based on the allowable FAR in the relevant zone district, not to a specific number. See Order at 26-27 (COL 8). Here, the residentially-zoned portions of the campus are in the R-5-D and R-5-E Zone District, and are aggregated to the maximum permitted FAR in the R-5-D Zone District, which has a maximum density of 3.5 FAR as a matter of right and up to 4.5 FAR achievable through the PUD process. Upon full buildout of the Campus Plan / PUD, the proposed density for the residentially-zoned portions of the campus will be approximately 3.69 FAR, less than the density of 4.5 FAR permitted under the PUD process in the R-5-D zone. As demonstrated in the attached FAR Report, upon completion of the proposed

project the FAR for the residentially-zoned portions of the campus will be 3.21, which is well within the permitted FAR.

D. Submission of a Plan for Developing the Campus as a Whole

The University's plan for developing the campus as a whole, as required under Section 210.4 of the Zoning Regulations, was approved by the Zoning Commission in the Campus Plan / PUD Order, affirmed by the Court of Appeals, and re-affirmed by the Commission with respect to the methodology for counting the number of students on the Foggy Bottom campus. The approved plan included details on buildings, parking, and loading facilities; screening, signs, streets, and public utility facilities; athletic and other recreational facilities; and a description of all activities and of the capacity of all present and proposed development. The proposed construction, including parking and loading facilities, screening and streetscape improvements, and uses are consistent with the approved Campus Plan.

E. No Interim Use of Land is Proposed

As discussed above, no interim leased space will be required for the university uses displaced by construction. Some interim leased space may be required to accommodate the parking spaces that will be displaced by construction of the proposed improvements, depending on the precise sequence of redevelopment of Square 103 with other proposed development sites. The University is currently working to finalize the sequencing and identify opportunities for interim leased parking spaces to accommodate parking demand and ensure the minimum requirement of 2,800 off-street parking spaces are provided.

F. No New Use Sought for Approved Site of Buildings Moved Off-Campus

The University does not seek approval for any new use of a previously-approved building site to be moved off-campus.

G. Compliance with the Policies of the District Elements of the Comprehensive Plan

As discussed in detail in Section VII below, this application complies with the policies and goals of the Comprehensive Plan.

H. The Proposed Buildings are within the Floor Area Limit for the Campus as a Whole

As discussed above, upon full buildout of the Campus Plan / PUD, the proposed density for the residentially-zoned portions of the campus will be approximately 3.69 FAR, less than the density of 4.5 FAR permitted under the PUD process in the R-5-D zone. As demonstrated in the attached FAR Report, following the completion of the Project the FAR for the residentially-zoned portions of the campus will be 3.21, which is well within the permitted FAR.

I. Referral to the District of Columbia Office of Planning and District Department of Transportation

The University has met with the D.C. Office of Planning and District Department of Transportation regarding the proposed project, and the application will be referred to both agencies for their review and report.

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 at 16-17 (FOF 68-69). The proposed project significantly advances these purposes by furthering the social and economic development of the District through the continued improvement of the University.

A. *Land Use Maps*

The Property is located in the Institutional land use category on both the Future Land Use and Generalized Policy maps. The Framework Element provides guidelines for using the Future Land Use and Generalized Policy Maps. This Element states that the Future Land Use map should be interpreted “broadly” and that zoning for an area should be guided by the Future Land Use Map interpreted in conjunction with the text of the Plan. The Element also clearly provides that density and height gained through the Planned Unit Development process as bonuses that may exceed the typical ranges cited for each land use category. The Element also states that, 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 proposed infill project and its related changes in use are consistent with the approved Campus Plan and are compatible with the nearby mix of high-density commercial, 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 provision of on-site parking, 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. 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.

The approved Campus Plan is also 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 low-impact 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, including the provision of adequate on-site parking for institutional uses, which is supported by the Comprehensive Plan’s Education Element. See Policy EDU-3.3.5.

The Foggy Bottom Campus Plan also complies with other citywide elements of the Comprehensive Plan, including the Transportation, Environmental Protection, and Urban Design Elements. Consistent with the policies of the Transportation Element, the Campus Plan includes pedestrian and bicycle related improvements, a continued commitment to transit-oriented development anchored by the Foggy Bottom Metrorail station, and use of private shuttle services such as the Vern Express and Colonial Express shuttle buses as multi-modal transportation solutions. See T-2.2 – T-2.4; T-3.1 – T-3.2. Specifically, this project provides improvements to

the pedestrian streetscape and covered bicycle storage, thus fulfilling “action” items of the Comprehensive Plan. See Action T-2.2.C; Action T-2.3.A. The Campus Plan also provides baseline commitments to use low-impact development features and green building commitments, consistent with the Environmental Protection Element’s focus on promoting environmental sustainability, and the proposed project incorporates many of the features called for the Environmental Element, including the use of permeable materials, landscaping, and green roofs to reduce runoff and green engineering to promote reuse of greywater. See Policies E-3.1.1 to E-3.1.3. Finally, the project will fulfill urban design goals of the Comprehensive Plan pertaining to streetscapes, sidewalks, and urban parks and places, see UD-3, and screens the interim surface parking as called for by Policy UD-2.2.10.

Finally, the Campus Plan is 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 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. The project will further these efforts by promoting the dispersal of the University’s parking supply, which will reduce traffic impacts yet retain an adequate on-campus parking supply as well as providing other features that ensure an attractive and sustainable development.

VIII. CONCLUSION

For the foregoing reasons, the University submits that the enclosed applications meet the standards of Section 210 and Chapter 24 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 second-stage PUD application, modification of the first-stage PUD application, and further processing application should be approved and adopted by the Zoning Commission.

Accordingly, the University respectfully requests that the Zoning Commission set the PUD application down for a public hearing at the earliest possible date.

Respectfully submitted,

GOULSTON & STORRS, PC

_____/s/_____

Maureen E. Dwyer

_____/s/_____

David M. Avitabile

Date: August 17, 2010