

FOGGY BOTTOM CAMPUS PLAN / PUD
SQUARE 77A DEVELOPMENT SITE



BY THE GEORGE WASHINGTON UNIVERSITY

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

December 14, 2012

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TABLE OF CONTENTS

DEVELOPMENT TEAM	II
TABLE OF CONTENTS	III
EXHIBITS.....	V
PREFACE	VII
I. INTRODUCTION	1
A. Summary of Requested Action	1
B. The Applicant.....	2
C. Project Goals and Objectives and the Benefits of Using the PUD Process	3
D. Development Timetable	4
II. OVERVIEW OF THE FOGGY BOTTOM CAMPUS PLAN AND FIRST-STAGE PUD	5
III. THE PROPOSED PUD PROJECT	9
A. Site Location	9
B. Project Description.....	10
C. Development Parameters Under the Approved First-Stage PUD and Summary of Proposed Second-Stage Development	14
D. Flexibility Under the PUD Guidelines	14
IV. PLANNING ANALYSIS	19
A. Land Use Impact	19
B. Zoning Impact	19
C. Environmental Impact	20
D. Facilities Impact	20
V. PUD EVALUATION STANDARDS	21
A. Second-Stage Application Filing Requirements	21
B. Additional Filing Requirements from Conditions of Approval	21
C. Public Benefits and Project Amenities.....	24
<u>1. Urban Design, Architecture, and Landscaping</u>	<u>24</u>
<u>2. Site Planning, and Efficient and Economical Land Utilization</u>	<u>25</u>
<u>3. Effective and Safe Vehicular and Pedestrian Access and Transportation Management Measures</u> <u>25</u>	
<u>4. Environmental Benefits.....</u>	<u>26</u>
<u>5. Uses of Special Value</u>	<u>26</u>
<u>6. Historic Preservation.....</u>	<u>27</u>
<u>7. Comprehensive Plan</u>	<u>27</u>
VI. FURTHER PROCESSING EVALUATION STANDARDS	29

A.	College or University which is an Academic Institution of Higher Learning	29
B.	The Use is Located so that it is Not Likely to Become Objectionable to Neighboring Property	29
<u>1.</u>	<u>Noise</u>	<u>29</u>
<u>2.</u>	<u>Traffic</u>	<u>30</u>
<u>3.</u>	<u>Number of Students or Other Objectionable Conditions</u>	<u>30</u>
C.	Compliance with the Maximum Bulk Requirement	31
D.	Submission of a Plan for Developing the Campus as a Whole	31
E.	No Interim Use of Land is Proposed.....	31
F.	No New Use Sought for Approved Site of Buildings Moved Off-Campus.....	32
G.	Compliance with the Policies of the District Elements of the Comprehensive Plan	32
H.	The Proposed Buildings are within the Floor Area Limit for the Campus as a Whole .	32
I.	Referral to the District of Columbia Office of Planning and District Department of Transportation	32
VII.	COMPLIANCE WITH THE COMPREHENSIVE PLAN	33
A.	Land Use Maps.....	33
B.	Land Use Element	34
C.	Other Citywide Elements	35
VIII.	CONCLUSION.....	37

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
Surveyor's Plat	C
Notice of Intent to Surrounding Property Owners and Certificate of Notice	D
Property Owners' List	E
Environmental Analysis	F
List of Publicly Available Information	G
<i>Intentionally Omitted</i>	H
FAR Report	I
Fall 2012 Foggy Bottom Campus Plan Compliance Report	J
Streetscape Plan Progress Report	K
Off-Street Parking Census	L
Transportation Management Program Status Report	M
Certificate of Presentation to Advisory Committee and Meeting Minutes	N
List of Outsourcing Activities	O

PREFACE

This statement and the attached documents support the application of The George Washington University (“University” or “Applicant” or “GW”) to the Zoning Commission for second-stage approval of a Planned Unit Development (“PUD”) for the property known as Square 77, Lots 5, part of 845, and 846 as well as a portion of the public alley that is proposed to be closed (“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 (hereinafter, the “Campus Plan / PUD”). In conjunction with this application, the University also requests further processing approval for the proposed application under its approved 2007 Foggy Bottom Campus Plan, which was also approved by the Zoning Commission in Order No. 06-11/06-12.

The University intends to develop the Subject Property, which is located midblock in Square 77 between H and I Streets, as a new residence hall. The new residence hall will be comprised of retained portions of three existing residence halls located along H and I Streets and a new twelve-story infill addition that connects the existing residence halls. The completion of the new residence hall will provide approximately 326 net new additional on-campus beds to offset the planned discontinuation of undergraduate housing at City Hall, an off-campus property, as required by Condition P-8 of the Campus Plan / PUD Order. The new building will also contain ground-floor retail space along I Street and two stories of below-grade space that contains additional retail, student life, and student services space. The proposed mix of uses is consistent with the residential / student life / athletic designation under the Campus Plan.

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 and landscaping, ground floor retail space, historic preservation and, most importantly, additional on-campus housing that facilitates the transition of City Hall to a use other than undergraduate student housing.

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 in the following pages, 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 “GW”) 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 77, Lots 5, part of 845, and 846 as well as a portion of the public alley that is proposed to be closed (“Subject Property”).¹ 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”). The University also requests further processing approval for the proposed application under its approved Campus Plan.

The Subject Property consists of approximately 33,413 s.f., or approximately 0.77 acres, of land area and is improved with the West End, Schenley, and Crawford residence halls as well as a public alley and surface parking. The University will retain the front portion of the existing residence halls and construct a new 12-story infill addition connecting all three buildings (the “Project”). The proposed Project will provide an additional 326 net new beds to the Foggy Bottom campus as well as housing for faculty- and staff-in-residence. The Project will also include some ground-floor retail space along I Street as well as two below-grade stories containing retail / dining, student program, and student services space. The proposed mix of uses is consistent with the residential / campus life / athletic designation under the Campus Plan. The Project must be completed by Summer 2016 in order to open for the Fall 2016 academic year

¹ A portion of Lot 845 as well as the remainder of the public alley to be closed will be allocated to Lot 60 through the subdivision process.

and to offset the planned discontinuation of undergraduate housing at City Hall, an off-campus property, as required by Condition P-8 of the Campus Plan / PUD Order.

The Project is consistent with the guidelines and conditions of the First-Stage PUD. The Project will generally have a building height of approximately 110 feet, stepping down to a height of approximately 85 feet along H Street and I Street. The total gross floor area included in the Project is approximately 256,751 square feet for a total Floor Area Ratio (“FAR”) of approximately 7.68 and a lot occupancy of approximately 73%. The Project will not include any parking.² Loading for the Project will be conducted within a shared service area interior to the block, and will be accessed from an existing curb cut on I Street.

The Subject Property is located on the Foggy Bottom Campus and is also located in the Institutional Land Use category on the Future Land Use Map. As a part of the approved First-Stage PUD, the Commission approved the rezoning of the Subject Property from the R-5-D Zone District to the C-3-C Zone District. The University will use the second-stage PUD process to achieve relief from the court, roof structure, accessory building, and loading provisions of the Zoning Regulations. As contemplated in the First-Stage PUD, the University will seek approval for the proposed alley closure through a related proceeding before the Council of the District of Columbia.

B. The Applicant

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 research university with the

² As discussed in greater detail herein, this development site was identified as a potential new underground garage parking site in the Campus Plan / PUD, and the University has elected not to include parking as a part of this Project.

dynamics of a vibrant, urban setting in the heart of the nation's capital. The University'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 the University and also help shape some of its most successful academic, research, and clinical programs. By capitalizing on its location, the University delivers an educational experience that is distinctive and rewarding – encouraging students to take advantage of opportunities in international finance, public policy, democratic governance, and many other pursuits that are truly unique to DC.

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

Pursuant to a key public benefit of the Campus Plan / PUD and consistent with goals in the District of Columbia Comprehensive Plan, the proposed PUD will facilitate the phase-out of undergraduate student housing in University-controlled off-campus housing in the Foggy Bottom/West End neighborhood through the construction of 326 net new on-campus beds. Consistent with the goals of the approved Campus Plan / PUD, the proposed PUD accommodates the height and density needed for this use at the core of the Campus. The proposed development will also further Campus Plan goals related to the provision of retail space along the proposed I Street retail corridor, preservation of historic buildings, commitment to sustainable design and planning, and improvement of neighborhood streetscape.

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 proposed height, density and uses are appropriate and the architecture is compatible with the surrounding neighborhood.

D. Development Timetable

In order to meet the aggressive timetable mandated by Condition P-8 of the Campus Plan / PUD Order, the University intends to demolish portions of the existing structures in Fall 2013 and commence excavation shortly thereafter; the total construction period is expected to be completed in Summer 2016.

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.³ 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 Campus Plan incorporates 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

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

individually evaluated and selected based on each site's current use and condition, suitability for redevelopment, existing campus use patterns, and the University's overall forecasted space requirements. The Commission recognized that the campus-wide PUD would provide certain project amenities and public benefits, including an advisory committee to foster communication between the University and community representatives, streetscape improvements, sustainable development features, commitments to historic preservation and neighborhood-serving retail activity on certain portions of the Campus, construction of below-grade parking at various sites dispersed through campus, and off-campus commitments to cease the use of University-controlled off-campus properties for undergraduate housing, all of which were determined as part of the first-stage approval.

Since the approval of the Campus Plan / PUD in 2007, the University has moved forward with the implementation of many of the proffered benefits and amenities outlined in the conditions of the Commission's Order. The University has also moved forward with the implementation of the Campus Plan / PUD, and has received approval for four major projects from the Commission, including a new underground parking garage and program space for the Law School, the Science and Engineering Hall, the School of Public Health and Health Services, and The George Washington University Museum. Construction of all four projects is underway. The University is awaiting Zoning Commission action on a fifth application for approval of a new commercial office building along Pennsylvania Avenue. The University has also moved forward with the implementation of other renovation projects and improvements to its Foggy Bottom Campus, including the renovation of the former Alumni House at 1925 F Street, the renovation of the Charles E. Smith athletic center, and the renovation of the Lafayette Hall student residence facility.

The Project is critical to the implementation of a key Campus Plan / PUD commitment regarding the phase-out of undergraduate housing in University-controlled off-campus properties. Pursuant to Condition P-8 of the Campus Plan / PUD Order, the University must discontinue undergraduate student housing in its off-campus properties in the Foggy Bottom / West End neighborhood. The University has one remaining off-campus undergraduate facility – City Hall, located at 24th and K Street, which the University controls pursuant to a lease that expires in Summer 2016. Under the timeline established in Condition P-8, the University must discontinue undergraduate housing at City Hall by the expiration of that lease (that is, July 1, 2016). Therefore, the proposed Project must be completed in time to provide additional beds to offset the phase-out of City Hall as an undergraduate housing facility.

III. THE PROPOSED PUD PROJECT

A. *Site Location*

The Subject Property is located in the heart of 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 Foggy Bottom-GWU Metrorail station is located less than two blocks west of the Subject Property at the intersection of I Street NW and 23rd Street NW.

The Subject Property consists of approximately 33,413 s.f., or approximately 0.77 acres, of land area. The Subject Property is a rectangular through parcel located in the middle of Square 77 and fronts on both H Street NW and I Street NW. The Subject Property is currently improved with the West End, Schenley, and Crawford residence halls as well as a public alley and surface parking in the interior of the square. The three eight-story structures have been identified as contributing buildings in the proposed historic district. The residence halls are able to accommodate up to 568 students.

To the west of the Subject Property is the University's 89-foot tall Academic Center. Pursuant to the approved Campus Plan / PUD, the Commission has approved the redevelopment of the Academic Center to a height of 110 feet. To the east of the Subject Property is the 71-foot tall Marvin Center. The Commission also approved an addition for the northwest corner of the Marvin Center, up to a height of 90 feet, as a part of the Campus Plan / PUD. To the north, across I Street, is Rice Hall, an eight-story administrative building that is proposed to be redeveloped as an academic / administrative / medical building with a height of 110 feet. To the south, across H Street, is Kogan Plaza.

Pursuant to the Campus Plan / PUD, the Commission approved the rezoning of the Subject Property to the C-3-C Zone District. Development sites to the north, west, and southwest have also been approved for rezoning to the C-3-C Zone District. Property to the northwest, east and south is located in the R-5-D Zone District. Property to the northeast is located in the C-3-C Zone District.

B. Project Description

As shown on the architectural plans, elevations, and drawings attached as Exhibit A, the University will retain the front portions of West End, Schenley, and Crawford Halls and construct a 12-story infill addition that will create a new residence hall (the “Project”). The Project will also include two stories of below-grade retail/dining venues, student program space, and student services space as well as ground-floor retail space along I Street NW. The primary uses within the Project are consistent with the Subject Property’s residential / campus life / athletic designation under the approved Campus Plan.

The residential component of the Project will be able to accommodate up to provide up to 894 student beds (326 net new beds) through two types of student housing: affinity-based group housing in the retained portions of West End, Schenley, and Crawford Halls and more traditional units in the infill addition.⁴ Affinity housing facilitates a living and learning experience for groups of students within a student organization, athletic group, or academic organization who choose to live together in a single affinity unit. Each affinity unit will provide approximately 16-20 beds, and the required size and configuration of the affinity units corresponds well with the dimensions of the retained portions of the buildings. The remaining units will consist of

⁴ The University reserves flexibility to modify the number, type, and configuration of beds over the life of the Project, provided that the University remains within any applicable limitations on enrollments or on-campus beds.

efficiency and two-bedroom apartment units located in the infill addition. The Project will also contain housing for faculty- and staff-in-residence.

The Project will also feature approximately 1,600 square feet of ground-floor retail space along I Street as well as approximately 5,000 square feet of lower-level space for retail / dining venues in the B1 level of the project. The University also plans to relocate GW Mail Services into the Project.⁵ The relocated Mail Services will also be located on the B1 level of the Project and will consist of approximately 6,400 square feet space that will serve as a centralized location for all on-campus students to pick up mail and packages and will therefore further promote foot traffic to the retail venues. The balance of the B1 level will contain approximately 8,000 square feet of student life space that will include seating for the retail venues, informal social spaces, and similar uses. The B2 level of the Project will contain an additional 11,300 square feet of student program space as well as building support space and a significant portion of the building's mechanical systems.

The Project will feature entrances to both the public portions of the Project (that is, the retail/dining, mail services, and student life spaces) as well as the residential portions of the Project through entrances on both H Street and I Street, including a new entrance that will be constructed on the former public alley between Schenley and Crawford on H Street NW.

The Project is designed to sensitively integrate West End, Schenley, and Crawford Halls and the proposed addition into an attractive new building. As set forth in the Campus Plan /

⁵ GW Mail Services is currently located in the Support Building at 2025 F Street NW, near the southern perimeter of the Campus. Currently, GW Mail Services receives all U.S. Mail delivered to the University's zip code (20052) and then distributes such mail to individual academic and administrative departments and residence halls throughout the camps (primarily on foot by University mail carriers). UPS, FedEx, and other carriers deliver packages for students living in on-campus residence halls to GW Mail Services and students pick up the packages at Mail Services. Packages for academic and administrative departments are received directly at the appropriate building or department.

PUD's Historic Preservation Plan, the University will preserve the front portions of the existing structures through the retention of the existing facades and the removal and reconstruction of the existing floor slabs in approximately their current locations, as shown on page A11 of Exhibit A. The addition is composed of a single masonry bar that connects the three retained structures. Along the west façade, four shallow bays that are proportional to the depth of the retained facades are carried across the bar, and modifications to the fenestration pattern at the top and bottom of the bar provide the façade with a sense of a cap and a base. Along the east façade, the design incorporates additional windows along the primary and secondary elevator cores to further articulate the design and provide light into the elevator lobbies and stairwells. On the south façade, the design incorporates a vertical extension of the bar that extends out from the bar and down through the "slot" between Schenley and Crawford to the ground level and the new public entrance to the below-grade portions of the Project.

The University has discussed the proposed changes to the existing structures and the design of the proposed addition with the Historic Preservation Office ("HPO") and has modified the design in response to HPO's comments and feedback. The University will present the proposed design to the Historic Preservation Review Board ("HPRB") at the December 2012 public meeting and expects to continue to refine the project design in response to any future HPO and HPRB comments.

The Project also incorporates sustainable features that demonstrate the University's continued commitment to the use of innovative sustainable design practices. Among other features, the Project will contain approximately 7,000 square feet of green roof, which includes approximately 30% of the total roof area. Other specific sustainable features will be identified as

the project design is advanced. The Project is targeting a Silver Rating in the USGBC's LEED 2009 for New Construction Rating System.

Although identified as a potential parking site for 136 vehicles in the Campus Plan / PUD, the University has elected not to construct parking on the development site as part of this Project. The University expects to provide a minimum of approximately 132 bicycle parking spaces within the building. As a result of the proposed alley closing, one curb cut will be closed along H Street and an existing back-in loading area along I Street will be converted into a "front-in, front-out" shared entrance for loading for the Project and the Marvin Center. The entrance to the loading area will continue to remain on the Marvin Center lot.

The Project will feature two loading areas, each with space for multiple vehicles. One loading area, located at the south end of the Subject Property, will be reserved for use by the retail/dining and Mail Services operations. The other loading area, located in the middle of the Subject Property along the Project's eastern façade, will be used by trash, recycling, and other University services. In order to create the shared loading area, the University will demolish an existing one-story loading dock that is part of the Marvin Center. The University will also implement a detailed Truck Management Plan, including control through an on-site dock manager and limits on the size of deliveries to both the Project and the Marvin Center, in order to regulate loading activity.

As a part of the Project, the University will improve the streetscape along H and I Streets in front of the Project. Consistent with the campus streetscape standards, the sidewalks on H and I Streets will be composed of brick and the area between the sidewalk and the street will feature cobblestones and treeboxes. The design of the public space will continue to be refined through discussions with HPO and public space officials.

C. Development Parameters Under the Approved First-Stage PUD and Summary of Proposed Second-Stage Development

On the Subject Property, the Campus Plan / PUD approved a rezoning to the C-3-C Zone District and authorized the redevelopment of the site for residential / campus life / athletic uses with a lot occupancy of 75% and gross floor area of 316,500 square feet. The Campus Plan / PUD called for the retention of the front portions of the existing buildings and approved a total height of 110 feet for the infill portion of the project. The Campus Plan / PUD anticipated that the redevelopment would deliver approximately 374 net new beds. The Campus Plan / PUD also called for a potential new underground parking facility with a total of approximately 136 parking spaces. Finally, the Campus Plan / PUD called for the closure of the public alley to facilitate the redevelopment of the Subject Property.

The total gross floor area included in the Project is approximately 256,751 square feet for a total Floor Area Ratio (“FAR”) of approximately 7.68 and a lot occupancy of approximately 73%. The Project will have a maximum height of approximately 110 feet, stepping down to a height of approximately 85 feet along H Street and I Street NW. The University has elected not to incorporate parking within the Project, which is not needed to maintain the required campuswide parking requirement. The Project will provide approximately 326 net new beds. Consistent with the Campus Plan / PUD, the University is seeking approval to close the public alley.

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 court, roof structure, accessory building, and loading requirements of the Zoning Regulations.

Courts. The proposed design results in the creation of a closed court on the east side of the Subject Property, an open court on the west side of the Subject Property, and an open court on the southern portion of the Property. (See A-22.) The open courts do not meet the width requirements of the Zoning Regulations, and flexibility is requested in order to accommodate the proposed design of the Project.

If all of the improvements in the square were on a single lot, the dimensions of the actual open space between the Project and the adjacent building to the west would generally meet the width requirements of the Zoning Regulations. The nonconformity of the west court is an abstraction created by the location of the existing structures and lot lines, and the open space itself meets the intent of the Regulations with regard to courts. Similarly, the southern court is the same width as the existing public alley, and merely carries forward an existing condition. The proposed infill of the “slot” significantly reduces the depth of this court and minimizes its impacts. As a result, the proposed courts provide all uses in the block with adequate light and air, and will not have any adverse impact on the surrounding properties (which are also owned by the University) or circumvent the purposes or intent of the Zoning Regulations.

Roof Structures. As shown on the Roof Plan (see A-17), the Project’s primary roof structure generally conforms with the height, setback, and design provisions regarding roof structures. The Project requires flexibility from the 1:1 setback provisions and the uniform height requirement, however, to accommodate the elevator overruns for the primary vertical core, which is not contained within the primary roof structure. The elevator core has been located adjacent to the eastern wall of the Project in order to improve the efficiency of the

building design and permit daylighting of the elevator lobby. As a result, the elevator overrides must extend above the roof and do not meet the 1:1 setback requirement. The height of this roof structure component is shorter than the height of the primary roof structure; this will minimize its visual impact but also requires additional relief.

This portion of the roof structure faces the interior court between the Project and the Marvin Center and the setback relief will not have any adverse impact on non-GW properties. The design of the overrun has been integrated into the overall building design so that it appears as a vertical embellishment of the eastern facade. The proposed flexibility is minor, and will not adversely impact surrounding properties nor circumvent the intent or purposes of the Zoning Regulations, because the proposed roof structure is interior to the square and the properties directly impacted are all owned by the University.

Accessory Building. Under the Zoning Regulations, accessory buildings are permitted on the same lot as a principal building, but must be located in a rear yard and are limited to 15 feet in height. The project design includes a one-story enclosure located at the ground floor near the southern loading area. This enclosure contains the service elevators for the below-grade portions of the Project. It is part of the underlying structure but is separated from the principal building at grade in order to create light, air, and windows for other ground-floor uses in the Project near the service elevators. Therefore, the service elevator enclosure is, for zoning purposes, an accessory building.

The accessory building is located in one of the courts described above, and flexibility is requested to locate this accessory building in the court instead of the rear yard. The location of the service elevators has been dictated by the layout of the shared loading area as well as the ground-level and below-grade floors, and the accessory building must be located as shown on the

plans in order to accommodate these layout needs. The accessory building is located at the rear of the structure, but not in the rear yard (the building is located on a through lot, which means the rear yard is measured to the midpoint of I Street). The proposed flexibility is minor and will not have an adverse impact on surrounding properties.

Loading. Under the Zoning Regulations, the proposed residence hall is a multiple dwelling with more than 50 units that requires one 55-foot deep loading berth, one 200-s.f. loading platform, and one 20-foot deep delivery space. The proposed retail component is smaller than 8,000 square feet of gross floor area and does not trigger a loading requirement. The remaining uses fall under the category of “all other uses”; they consist of less than 30,000 square feet of gross floor area and do not trigger a loading requirement.

The proposed Project will provide one 40-foot deep loading berth, two 30-foot deep loading berths, one 400-s.f. loading platform, and two 20-foot deep delivery spaces which is sufficient to accommodate the loading demand of the proposed uses. Relief is requested from the requirement for a 55-foot deep loading berth, which is not needed for the proposed uses. Although the Project contains the space to accommodate such a berth, the University has agreed to restrict the use of 55-foot trucks within the Project to permit a more efficient coordination of truck movement in the shared loading area.

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. In particular, the proposed Project will result in a more appropriate utilization of land located within two blocks of the Foggy Bottom-GWU Metrorail station. The proposed residential and GW Mail Services uses are already located on or adjacent to the campus and are being relocated to the Subject Property, which is centrally located at the heart of the Foggy Bottom campus. The proposed retail venues and student life uses are new uses but are expected to serve the existing campus population already present on the campus.

Furthermore, the PUD is consistent with the land use goals of the approved Campus Plan. The Project will provide additional on-campus student beds and facilitate the transition of the final University-controlled off-campus undergraduate housing site to uses other than undergraduate student housing. The Project also focuses height and density on the campus core near 22nd Street, and retains the front portions of the existing structures consistent with the Historic Preservation Plan for the campus. Finally, the Project will incorporate retail space along I Street, furthering the Campus Plan goal of the creation of an I Street Retail Corridor. In total, 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 residential, dining, student services, and student program uses are generally consistent with the approved residential

/ campus life / athletic uses for the development site. The Project will provide 326 net new beds, which is generally consistent with the 374 net new beds forecasted under the Campus Plan. PUD. Furthermore, the height, gross floor area, and lot occupancy of the Project are within the approved limits set forth in the Campus Plan / PUD approval. Finally, the proposed closure of the public alley is consistent with the Campus Plan / PUD.

C. *Environmental Impact*

As more specifically detailed in Exhibit E, no adverse environmental impact will result from the construction of the Project. Moreover, 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, including approximately 7,000 square feet of green roof. The Project is targeting a Silver Rating in the USGBC's LEED 2009 for New Construction Rating System.

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-GWU 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 utilize public transit. The Project will also improve the Campus' bicycle facilities through the provision of covered bicycle storage, which will promote the expanded use of cycling.

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.
- 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 Site 77A development site, and is consistent with the use, zoning, GFA, lot occupancy, and height for that development site.
- 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 Site 77A 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 the height and density of adjacent and nearby properties, which are largely owned by the University. Furthermore, the proposed height and density of the Project is consistent with the overall goals of the Campus Plan / PUD, which called for greater height and density at the center of the Campus, and it will correspond with the heights and densities approved for future development immediately to the west, north, and southwest. The Project also incorporates the front portions of the existing structures and therefore steps down in height to approximately 85 feet along H Street and I Street.

The proposed site and circulation plans are also compatible with adjacent and nearby structures and uses. Through the related alley closure, the proposed PUD will eliminate an existing curb cut and convert an existing back-in loading entrance to a shared front-in, front-out loading entrance on I Street.

- 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 intended to be located within the proposed Project.

The existing University housing supply is able to accommodate demand for the beds that will be taken offline during construction of the Project.

- Condition P-16(d): FAR Report. As detailed in the report attached as Exhibit I, the University's existing FAR within the residentially-zoned portions of the Foggy Bottom Campus Plan boundaries is 3.19, including buildings that are currently under construction or pending approval within the Campus. Upon completion of the proposed improvements as well as all other improvements currently under construction or pending before the Zoning Commission, the University's FAR in the residentially-zoned portions of the Foggy Bottom Campus will be 3.16. 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 2012 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, implementation of the Streetscape Plan is well underway and continues to be advanced through planned University improvements.
- Condition P-16(g): Off-Street Parking Space Census. As detailed on the parking census attached as Exhibit L, as of December 2012, the University provided a total of 2,437 off-street parking spaces, with capacity for 2,862 spaces through the use of valet/attendant parking.

Upon the completion of this Project as well as all other improvements currently under construction or pending before the Zoning Commission, the University will have approximately 3,300 parking spaces (including self and valet spaces), well above the required minimum of 2,800 spaces.

- 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 40%, to 1,330 participants, since 2007.
- Condition P-16(i): Advisory Committee Consultation. The University presented the Site 77A PUD project to the Advisory Committee at a regularly-scheduled meeting on November 7, 2012. 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 ANC 2A at the ANC's regularly-scheduled November 2012 public meeting and expects to return to ANC 2A for additional discussion at the December 2012 public meeting.

The University also expects to continue dialogue at the Advisory Committee and with representatives of the Foggy Bottom/West End community regarding the project leading up to the public hearing.

- Condition P-16(j): List of Outsourcing Activities. The University has not, in any 30 day period since the filing of the Site 75A second-stage PUD application, 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 the benefits and amenities promised 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, environmental benefits, provision of special uses such as ground floor retail uses, and historic preservation.

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, and sustainable features.

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 proposed Project provides a more efficient utilization of this strategic transit-oriented site and appropriately focuses height and density at the core of the Foggy Bottom campus.

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. Here, the elimination of one curb cut and creation of a shared loading entrance for the Project and the Marvin Center will result in improvement to both pedestrian and vehicular circulation surrounding the site. The Project is also expected to include a minimum of approximately 132 bicycle parking spaces within the building.

The Project is not expected to generate additional trips to the Foggy Bottom campus. The proposed residential component will replace beds that are already located either on the site or just a few blocks away at City Hall, and the students will generally walk or use public transportation. Similarly, the Mail Services component is merely being relocated from an on-campus location three blocks to the south of the Subject Property to a more central site at the hearing of the campus, and will not generate additional trips to the campus. Finally, the

proposed retail and student life uses are expected to serve the existing campus population and will not generate additional trips to the campus.

The proposed Project's loading operations are expected to operate in a safe and efficient manner. The proposed use of the I Street driveway for loading access also represents an effective and safe design as well as an improvement over existing conditions. Benefits include:

- Internal Off-Street Loading and Turnaround: The proposed loading area will keep all loading and service activity internal to the square, and provide a turnaround area sufficiently large enough to permit delivery trucks to enter the site front first, maneuver within the square to back into the loading area, and then leave the site front-out.
- Truck Management: As detailed in the Truck Management Plan included in the Traffic Study, the University will manage deliveries to the Project in order to reduce the impact of such activity on surrounding pedestrians and uses. In particular, the University has agreed to restrict the use of 55-foot trucks and designate an on-site dock manager to monitor and address issues.
- Elimination of Existing Back-In Loading: To facilitate the new shared loading entrance, the University will remove an existing loading area for the Marvin Center that requires trucks to maneuver through a back-in operation.

Wells + Associates, Inc. ("Wells"), the traffic and parking engineer for this Project, is preparing a transportation assessment of the Project, which will be provided prior to the public hearing.

4. Environmental Benefits

Section 2403.9(h) states that environmental benefits are considered to be public benefits and project amenities of a PUD. The Project is targeting a Silver Rating in the USGBC's LEED 2009 for New Construction Rating System and will include a green roof, among other features. The University expects to provide more detail on the specific sustainable initiatives prior to the public hearing.

5. Uses of Special Value

Section 2403.9(i) provides that uses of special value to the neighborhood or District of Columbia as a whole are benefits and amenities of a PUD. Here, the provision of ground-floor

and below-grade retail space along I Street is a benefit and amenity of the PUD that will contribute to the creation of an I Street retail corridor between the Foggy Bottom-GWU Metrorail station and the Shops at 2000 Penn.

6. Historic Preservation

According to Section 2403.9(d), the preservation of historic buildings or places is considered to be a benefit and amenity of the PUD process. Here, the Campus Plan / PUD has resulted in the preservation of multiple historic structures throughout the Campus, including the front portions of the three residence halls located on the Subject Property that are considered to be contributing buildings in the proposed historic district. The proposed Project furthers the University's commitment to historic preservation through the adaptive reuse of Schenley, Crawford, and West End and integration of the front portions of those structures into the proposed Project.

7. 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.

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 called for 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 relocating additional undergraduate student beds on campus and concentrating campus development within the core of the Campus. The proposed Project will also reduce noise on surrounding streets by creating an off-street loading, service, and turnaround area within the square, accessed from the existing driveway off I Street.

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 Project will not contain any parking. The Project will generate very minimal additional trip generation: the residential component will result in no additional trips to the surrounding roadway network because the proposed beds simply replace existing beds located either on-site or a few blocks away at City Hall, and the retail/dining, student life, and mail services venues will generate few additional trips because the students who will use the facilities are already located on or near campus. The Project also includes secured bicycle storage. Finally, as described in detail above, the I Street loading area has been sensitively designed in order to minimize objectionable impacts.

3. Number of Students or Other Objectionable Conditions

As described by the Commission in the Campus Plan / PUD Order and reaffirmed in the Order on Remand, the Commission found that the Campus Plan would not create objectionable conditions due to the number of students. Here, the Project will provide additional on-campus beds and will facilitate a reduction in the number of students living outside of the boundaries of the Foggy Bottom campus. The Project's retail, student life, and student services components

will further enhance the on-campus residential environment and draw activity into the heart of the campus, away from the surrounding residential communities.

C. Compliance with the Maximum Bulk Requirement

As demonstrated in the attached FAR Report in Exhibit I, upon completion of the proposed Project and all other developments pending Zoning Commission approval, the FAR for the residentially-zoned portions of the Campus will be 3.16, which is well within the permitted FAR of 3.69 approved in the First-Stage PUD.

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 on remand with respect to the methodology for counting the number of students on the Foggy Bottom Campus. The approved Campus Plan includes 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 the height and density of the proposed building, 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

No interim use of residentially-zoned land is proposed. As discussed above, no interim leased space will be required for the university uses displaced by construction.

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 in Exhibit I, following the completion of the Project and all other developments pending Zoning Commission approval, the FAR for the residentially-zoned portions of the Campus will be 3.16, 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 providing on-campus housing, promoting historic preservation, and 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 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 Education and Economic Development Elements of the Comprehensive Plan. Most notably, the Project furthers Educational Element goals for additional on-campus student housing. See Policy EDU-3.3.4. Implementation of the approved Campus Plan through this Project is also consistent with Education 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, which is supported by the Comprehensive Plan's Education Element. See Policy EDU-3.3.5.

The Economic Development Element notes that educational services, as one of the 20 largest private sector industries as well as one of the top 15 projected high growth industries in the District, is 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 Project will also further other citywide elements of the Comprehensive Plan, including the Historic Preservation, Transportation, Environmental Protection, and Urban Design Elements.

- The Project furthers goals and policies of the Historic Preservation Element that call for the appropriate preservation of historic buildings, adaptive reuse of historic structures, and compatible new development that is suitable to the historic context. See Policy HP-2.4.4. The Project is not inconsistent with Policy HP-2.4.5, which calls for the protection of historic building integrity, because the Campus Plan explicitly contemplated the preservation of only the front portions of the existing structures and the proposed modifications to the retained portions will effectively preserve the integrity of the front portions of the structures as they read from the streets. As discussed above, the proposed treatment of the structures has been extensively discussed with HPO staff. Consistent with Action HP-2.4.A, the University will seek concept review of the Project design at HPRB's December meeting.
- Consistent with the policies of the Transportation Element, the Project reinforces the University's continued commitment to transit-oriented development anchored by the Foggy Bottom-GWU Metrorail station, as well as encouragement of transportation demand management and pedestrian- and bicycle-related improvements,. See T-2.2 – T-2.4; T-3.1 – T-3.2. In particular, this Project provides improvements to the pedestrian streetscape and covered bicycle storage in the garage, thus fulfilling “action” items of the Comprehensive Plan. See Action T-2.2.C; Action T-2.3.A.
- The proposed Project incorporates many of the features called for in the Environmental Element, including the use of permeable materials, landscaping, and green roofs to reduce runoff. See Policies E-3.1.1 to E-3.1.3. In particular, the Plan recommends that provisions for energy efficiency be considered with respect to planning and zoning standards. See E-2.2.5.
- The design of the proposed building will further many of the goals of the Urban Design Element, including providing new development that complements the form, height, and bulk of the proposed historic district (UD-2.2.2); creating attractive facades with articulation that provide visual interest (UD-2.2.5); and maintaining the established façade lines and form on H and I Streets (UD-2.2.6).

Finally, the Campus Plan is consistent with the Near Northwest Area Element. Most importantly, the Project will provide additional on-campus beds on the Foggy Bottom campus, consistent with Policy NNW-2.5.2. 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.

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 and further processing applications 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: December 14, 2012