

DEVELOPMENT TEAM

Applicant

The George Washington University
2121 I Street NW, 7th Floor
Washington, DC 20052

Architects, Engineers, and Consultants

Payette
285 Summer Street
Boston MA 02210

Ayers Saint Gross
800 Eye Street, NW, Suite 600
Washington, DC 20001

Affiliated Engineers, Inc.
401 N. Washington Street, Suite 400
Rockville, MD 20850

Wells + Associates
1420 Spring Hill Road, Suite 600
McLean, Virginia 22102

Land Use Counsel

Goulston & Storrs, PC
1999 K Street, NW, 5th Floor
Washington, DC 20006

TABLE OF CONTENTS

DEVELOPMENT TEAM	II
TABLE OF CONTENTS	IV
EXHIBITS.....	VI
PREFACE	VIII
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	7
A. Site Location	7
B. Project Description.....	8
C. Development Parameters Under the Approved First-Stage PUD	12
D. Flexibility Under the PUD Guidelines.....	12
IV. PLANNING ANALYSIS.....	15
A. Land Use Impact	15
B. Zoning Impact	15
C. Environmental Impact.....	15
D. Facilities Impact.....	16
V. PUD EVALUATION STANDARDS	17
A. Second-Stage Application Filing Requirements	17
B. Additional Filing Requirements from Conditions of Approval	17
C. Public Benefits and Project Amenities.....	20
1. Urban Design, Architecture, and Landscaping	20
2. Site Planning, and Efficient and Economical Land Utilization	21
3. Effective and Safe Vehicular and Pedestrian Access and Transportation Management Measures	21
4. Environmental Benefits.....	22
5. Comprehensive Plan.....	22
VI. FURTHER PROCESSING EVALUATION STANDARDS.....	23
A. College or University which is an Academic Institution of Higher Learning	23
B. The Use is Located so that it is Not Likely to Become Objectionable to Neighboring Property	23
1. Noise.....	23
2. Traffic.....	24

3.	Parking	24
4.	Number of Students or Other Objectionable Conditions	25
C.	Compliance with the Maximum Bulk Requirement	25
D.	Submission of a Plan for Developing the Campus as a Whole.....	26
E.	No Interim Use of Land is Proposed.....	26
F.	No New Use Sought for Approved Site of Buildings Moved Off Campus	26
G.	Compliance with the Policies of the District Elements of the Comprehensive Plan	26
H.	The Proposed Buildings are within the Floor Area Limit for the Campus as a Whole .	26
I.	Referral to the District of Columbia Office of Planning and District Department of Transportation	27
VII.	COMPLIANCE WITH THE COMPREHENSIVE PLAN	29
A.	Land Use Maps.....	29
B.	Land Use Element	30
C.	Other Citywide Elements	31
VIII.	CONCLUSION.....	35

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
Preliminary Traffic Analysis by Wells + Associates	H
FAR Report	I
Fall 2010 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”) to the Zoning Commission for second-stage approval of a Planned Unit Development (“PUD”) for the property known as Square 39, Lot 803 (“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 conjunction with this application, the University also requests further processing approval for this application under the Foggy Bottom Campus Plan, which was also approved by the Commission in Order No. 06-11/06-12.

The University intends to develop the Subject Property as the new home for its School of Public Health and Health Services (“SPHHS”). The proposed seven-story building, which will include academic and administrative program space for SPPHS, will be located across the street from the GW Hospital and one block from Ross Hall and Himmelfarb Library, the main facilities of the GW Medical Center. As a part of the project design, the University will also expand an existing public park at the intersection of 24th Street and New Hampshire Avenue.

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 removal of an existing surface parking lot.

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 39, Lot 803 (“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”). The University also requests further processing approval for the proposed application under its approved Campus Plan.

The Subject Property consists of approximately 21,456 s.f., or approximately 0.49 acres, of land area and currently contains the Helen L. and Mary E. Warwick Memorial Building and a surface parking lot. The University will demolish the existing structure and develop the Subject Property as the new for home its School of Public Health and Health Services (“SPHHS”). The proposed building will contain academic / administrative / medical program space for SPHHS in seven above-grade and two below-grade stories (the “Project”). As a part of the Project, the University will also expand the existing public park located at 24th Street and New Hampshire Avenue. The total gross floor area included in the Project is approximately 115,542 square feet for a total Floor Area Ratio (“FAR”) of approximately 5.39 and a lot occupancy of approximately 88.9%.

The Subject Property is currently located in the R-5-E Zone District, and in the Institutional Land Use category on the Future Land Use Map. The Commission previously

approved flexibility from the lot occupancy requirements for the Subject Property as a part of the First-Stage PUD. No other flexibility is requested as a part of this application.

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 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.

The University's School of Public Health and Health Services ("SPHHS") is committed to advancing the health of the populations of local, national, and global communities by developing tomorrow's leaders in public health and health services. Established in July 1997, SPHHS brought together three longstanding university programs in the schools of medicine, business, and education. Today, more than 900 students from nearly every U.S. state and more than 35 nations pursue undergraduate, graduate, and doctoral-level degrees in public health. The School's student body is one of the most ethnically diverse among the nation's private schools of public health. SPHHS also offers an array of joint degree programs, allowing students to couple a law degree with the Master of Public Health (MPH), or to combine an MPH with a medical

degree or an MA in International Affairs. A joint MPH/Physician's Assistant program is available, as is the opportunity to serve as a Peace Corps volunteer while pursuing an MPH.

While the University's Medical Center was founded in 1824, SPHSS was only established recently in 1997 and has never had a true "home." Instead, its seven departments currently occupy space in various University buildings and several leased office locations in the nearby Golden Triangle/K Street business corridor. The proposed construction that is the subject of this application is intended to consolidate the school's activities from its disparate locations and create a signature building and singular identity for the School.

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 in order to remove existing surface parking lots and improve the utilization of land located near the Foggy Bottom-GWU Metrorail station. This PUD will create a more attractive and sustainable use of the Property that is compatible with the Foggy Bottom Campus and adjacent residential neighborhood. As a part of the PUD, the University will also provide streetscape improvements to the entire square, including an expanded park at the intersection of 24th Street and New Hampshire Avenue.

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 January 2012 and expects that the construction period will last approximately 21-24 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 as well as other zone districts.¹ The Subject Property is located in the R-5-E Zone District and within the Campus boundaries. 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 generally 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 is the case here) 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

¹ 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.

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

Since the approval of the Campus Plan / PUD in 2007, the University has moved forward with the implementation of many of the proffered benefits and amenities outlined in the conditions of the Commission's Order. The University has also moved forward with the implementation of the Campus Plan / PUD, and filed an application for approval of a new underground parking garage and program space for the Law School in August 2010 and the Science and Engineering Complex in November 2010. 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, and the renovation of the Charles E. Smith athletic center. 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 nearing completion, and is expected to open in 2011.

III. THE PROPOSED PUD PROJECT

A. *Site Location*

The Subject Property consists of approximately 21,456 s.f., or approximately 0.49 acres, of land area, and is bounded by K Street NW, Washington Circle, New Hampshire Avenue NW, and 24th Street NW. The Subject Property is currently improved with a three-story structure known as the Warwick Building, which contains various clinical, academic / administrative / programs of the School of Medicine and Health Sciences and the GW Hospital. The Warwick Building is served by a curb cut and driveway located on 24th Street. The Subject Property also contains a surface parking lot containing 24 spaces, which is accessed from New Hampshire Avenue. A triangular public park is currently located in public space at the corner of New Hampshire Avenue NW and 24th Street NW.

To the west of the Subject Property, at the corner of 24th and K Streets is the ten-story City Hall, a former apartment building that the University occupies under a long-term lease and uses as an undergraduate residence hall. (Pursuant to the approved Campus Plan / PUD, the University will cease to house undergraduate students in City Hall in 2016.) South of City Hall along 24th Street are four rowhouses and the nine-story Jefferson House condominium, which are located in the Foggy Bottom Historic District. To the east of the Subject Property, across New Hampshire Avenue, is The George Washington University Hospital. The GW Medical Center's Ross Hall and Himmelfarb Library and the Foggy Bottom-GWU Metrorail station are located one block southeast of the Subject Property. To the northeast is Washington Circle, which is maintained by the National Park Service and is surrounded by a variety of building types and uses, including multistory office buildings, residential buildings, rowhouses, and a hotel, as well

as the Hospital. Immediately to the north is the K Street service road and then K Street itself, which runs underneath Washington Circle.

The Subject Property is located in the R-5-E Zone District and at the northwestern corner of the University's Foggy Bottom Campus. Property to the south and east is also within the Campus and is located in the R-5-D Zone District. Property to the north is generally located in the R-5-E Zone District, and properties to the west are located in the R-3 Zone District. The Foggy Bottom Historic District is also located to the west of the Subject Property.

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/medical or commercial/investment building on Square 39. In this application, the University seeks permission for the University's planned development of the Subject Property as a new home for its School of Public Health and Health Services ("SPHHS"). The triangular building will face Washington Circle and provide a new front door to the Foggy Bottom Campus.

As shown on the architectural plans, elevations, and drawings attached as Exhibit A, the Project consists of seven above-grade and two below-grade stories of academic and administrative spaces for SPHHS. At the ground floor, the main pedestrian entrance to the SPHHS will be located along its southeast front, oriented towards the University's Medical Center, Foggy Bottom Campus, and Foggy Bottom-GWU Metrorail station, and away from the residential community to the west. The ground floor frontage will also be recessed along New Hampshire Avenue up to Washington Circle, providing a covered, pedestrian-friendly entrance.

The ground floor will contain a lobby, auditorium, and function space intended to serve the SPHHS's academic mission. The Project's academic and administrative uses will generally consist of offices, classrooms, meeting spaces, student lounge and study areas. The Project may also incorporate a small café on the second floor to provide beverages and pre-prepared foods to building users. The building will include exercise rooms and specialty spaces specific to the teaching and research activities of the Exercise Science Department on its lower level.

Upper floors will generally feature offices on the western side of the building and classroom and student spaces on the east side of the building. Faculty offices uses tend to cease by the end of the business day, while student spaces are more likely to remain in use into the evening hours. As a result, this organization generally locates the less-intensive office space on the western side of the Project, facing the residential community.

The proposed exterior design utilizes a varied palette of materials to respond to the distinct scale and character of the urban environments that surround the Property on each façade. The north end of the Project faces K Street and Washington Circle and accordingly features glass curtainwall atop a granite base, including large windows set within angular concaved frames along the Circle itself, in order to define its relationship to this important public place. The south end of the Project, which faces another significant open space created by the intersection of New Hampshire Avenue with 24th and I Streets NW, also features a glass curtainwall but with a more open glass base in order to activate the nearby park and surrounding streetscape. The western facade, by contrast, utilizes terracotta panels as the primary material and smaller individual windows to provide a complementary mix of material and design to the mix of brick and masonry residential properties across 24th Street. These terracotta panels will be designed with a variety of horizontal patterns to add visual interest and texture to the façade. Finally, the New

Hampshire Avenue façade will be composed of a combination of curtainwall and patterned terracotta panels that respond to the architectural design and materials utilized by the GW Hospital across the street yet also define its main entrance and permit ample daylight to enter the building, as is discussed in detail below.

The exterior's terracotta panels will be installed using a rain screen wall system, where pressure is equalized on both sides of the panel, minimizing the potential for pressure-driven moisture to enter the building. In addition, no caulking or sealants are required between the panels, thus eliminating a component which, on standard masonry wall construction, requires regular maintenance and sometimes complete replacement. Illustrative examples of the proposed terracotta system are included in Exhibit A.

While the triangular-shaped lot is too narrow to permit a courtyard at the center of the building to bring in natural light, the design integrates specific features in order to bring natural light into the building's core. At the center of the Project, a sky-lit central atrium space will run the entire height of the building and provide natural daylight to its interior. In addition, a second atrium space will run the entire height of the building near its southern end and permit light to enter the building through a multi-story glass curtainwall along New Hampshire Avenue. This curtainwall will also feature an integrated solar shading screen to reduce solar gain in the interior.

In addition to the daylight harvesting and terracotta panel features described above, the Project will integrate other innovative sustainable design features that continue the University's commitment to the use of these practices. For example, the building's HVAC systems will consist of both active chilled beam and mass air displacement technologies, which will allow the building to improve over industry baseline standards for energy efficiency by over 20%. In

addition, the Project's stormwater management system will include both a green roof and a below-grade sandfilter that, together, will reduce stormwater runoff by more than 25%. The green roof, combined with pervious paving, will result in a total pervious coverage of approximately 50%, meeting District of Columbia regulations, USGBC LEED requirements, and the EPA's proposed MS4 stormwater requirement. Other sustainable features intended for the Project include native plantings, low-flow plumbing fixtures, energy-saving lighting controls, and numerous local, rapidly renewable and recycled content materials. The Project will not only meet GW's commitment to at least 16 points under LEED-NC 2.2, but also target a Silver Rating in the USGBC's LEED-NC 3.0 2009 Rating System.

As a part of the Project, the University will construct a series of perimeter improvements to the entire square, including an enhanced and expanded public park at the southern edge of the Project. Streetscape improvements surrounding the Project will also include paving, signage and street furniture in compliance with the current Foggy Bottom Campus Plan's Streetscape Guidelines. Plantings will consist of a mix of ground cover plants, shrubs and varying size trees. Low plantings and smaller trees will be located closer to the building to provide visual screening and a lower canopy, while taller trees will be placed along the street edges. Pervious paving will be used in zones that have a deeper setback from the street, such as the front along New Hampshire Avenue and at the southern part of the site, including the enhanced public park.

The Project will not include any on-site surface or below-grade parking. The faculty and staff of SPHHS currently work on campus and use public transportation or park vehicles in several University garages available near the site. The existing surface parking lot and curb cut along New Hampshire Avenue will be eliminated. The site will continue to be serviced from 24th Street; the loading entrance, however, will be relocated 16 feet to the north and be

internalized within the building, which represents an improvement over existing conditions. The relocated curb cut will be widened to 24 feet to accommodate the two-bay internal loading dock for trash and other service activities. The site will also provide ample amounts of bicycle parking.

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/administrative or commercial/investment uses with a height of 90 feet, lot occupancy of 90%, and gross floor area of approximately 115,549 square feet. The Campus Plan / PUD also called for the removal of the existing 24 parking spaces on the site and additional spaces on other development sites.

The total gross floor area included in the Project is approximately 115,542 square feet for a total Floor Area Ratio (“FAR”) of approximately 5.39 and a lot occupancy of approximately 88.9%. The Project will have a maximum height of approximately 90 feet. The Project will contain no parking spaces, but will include two loading berths for trash and service. The Project will be in full compliance with the Campus Plan and PUD.

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. The R-5-E Zone District permits a lot occupancy of up to 75% for matter-of-right development. In the first-stage PUD, however, the Commission approved a lot occupancy of up to 90% for future development on Square 39, and the proposed design is within this maximum.

The Project will contain more than adequate daylight for its users, due to the multiple lightwells that have been integrated into the project design. In addition, since the proposed Project is the only building within the square, the additional lot occupancy will not have any adverse impacts on other adjacent properties. Finally, the University will set aside much of the balance of the lot as expanded open space for the park that is located at the intersection of 24th Street and New Hampshire Avenue.

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 redevelopment of an underutilized site on the Foggy Bottom Campus near the Foggy Bottom-GWU Metrorail station as a new home for the University's School of Public Health and Health Services, consistent with the goals of the approved Campus Plan regarding the provision of new academic / administrative / medical space on the Foggy Bottom Campus. The PUD also removes a surface parking lot, consistent with the Campus Plan goal for removing such surface spaces. 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 as a new home for the School of Public Health and Health Services is consistent with the Commission's approval of commercial / investment or academic / administrative / medical uses for the development site in the Campus Plan. Furthermore, the height, gross floor area, and lot occupancy of the Project are well within the height, density, and lot occupancy approved by the Commission in the first-stage PUD.

C. *Environmental Impact*

As more specifically detailed in Exhibit E, 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. Stormwater runoff is expected to be reduced by more than 25% through the use of a sandfilter and a green roof. The green roof combined with pervious paving will result in a total pervious coverage of approximately 50%. Other innovative sustainable features, including daylight harvesting and the use of a terracotta rain screen wall system, will be combined with other sustainable design features to minimize the Project's environmental impact. The University is targeting a Silver rating under the LEED-NC 3.0 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 use public transit. The Project will also improve the Campus' bicycle facilities through the provision of ample bicycle parking, 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 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 is briefly discussed as follows:

- Condition P-14: Second-Stage PUD Required for Development Resulting in Additional Density or a Change in Use. Condition P-14 requires that, except for minor renovation projects including those necessary to address building code compliance, no development on Campus resulting in additional density or change in use is permitted unless approved by the Commission as a second-stage PUD. Such development is limited to the sites identified in the Campus Plan / PUD at the uses, zoning, gross floor area, lot occupancy, and height called for in the approved plan. Here, the proposed Project is located on the approved Square 39 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 Square 39 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 is generally surrounded by University properties to the east, south, and west, and the wide K Street right-of-way to the north. The Project includes specific design features that will minimize its impact on non-University residential properties to the southwest across 24th Street, including a greater proportion of wall to window and location of less-intensive academic office uses on the west side of the building. The proposed surface improvements will also create an attractive, sustainable, landscaped addition to the streetscape, and will include an enlarged park at the intersection of 24th Street and New Hampshire Avenue, across the street from these non-University properties.
- Condition P-16(c): Interim Leased Space for Activities Either Displaced by Construction or Intended to be Located Permanently in the Completed Structure. The University's academic / administrative / medical uses currently located on the Subject Property will be accommodated elsewhere on campus and/or within existing and additional interim leased space in the nearby Golden Triangle/K Street business corridor or similar areas that permit university use as a matter of right.

The various departments within SPHHS that are intended to be relocated to the Subject Property are currently located throughout the Campus or other existing leased space.

- 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 pending before the Zoning Commission or under construction, the University's FAR on 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 2010 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 streetscape master plan and begin the implementation of streetscape components of the Campus Plan / PUD.
- Condition P-16(g): Off-Street Parking Space Census. As detailed on the parking census attached as Exhibit L, as of November 2010, the University provided a total of 3,084 off-street parking spaces, with capacity for 3,739 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 a new total of nearly 3,400 parking spaces (including self and valet spaces), well above the required minimum of 2,800 spaces.² A full accounting of the existing 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 ("TMP") 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.
- Condition P-16(i): Advisory Committee Consultation. Starting as early as April 2008, the University notified the Advisory Committee of its intent to develop the Square 39 development. The University presented the Square 39 PUD project to the Advisory Committee at a regularly-scheduled meeting on June 7, 2010 (the eleventh 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

² Other projects currently under construction or pending before the Zoning Commission include Square 54, Square 103, and Square 55.

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 September 15, 2010 public meeting.

The University provided additional information to the Advisory Committee at its September 20, 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 filing of the Square 55 second-stage 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.

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 the low-scale Warwick building as well as a surface parking lot that fail to fully capitalize on the site’s transit-oriented location one block from Metrorail. The proposed Project will replace the existing improvements with an appropriately-sized infill development, with pedestrian entrances oriented towards the Campus and loading activity relocated from an exterior pad to within the new building.

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 remove the site’s surface parking lot and existing New Hampshire Avenue curb cut, which will eliminate vehicle trips along New Hampshire Avenue and permit the building’s primary pedestrian entrance to be located along this frontage, which is oriented towards the Campus. The Project continues to service the building from 24th Street; however, the loading entrance will be relocated further to the north and be internalized within the building, which represents an improvement over existing conditions. The Project also includes

bicycle storage. Wells + Associates, Inc., the traffic and parking engineer for this Project, has prepared a preliminary traffic assessment, attached as Exhibit H. A full assessment will be included in a supplemental filing.

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, including a green roof and sandfilter that will combine to reduce stormwater runoff by more than 25%, daylight harvesting features through multiple atrium spaces that run the entire height of the building, and the use of terracotta rain screen panels. The green roof combined with pervious paving will result in a total pervious coverage of approximately 50%. Other sustainable design features to minimize the Project's environmental impact, will include native plantings, low-flow plumbing fixtures, energy-saving lighting controls, CO2 monitoring and inclusion of numerous local, rapidly renewable and recycled content materials.

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.

The proposed Project furthers these goals by locating pedestrian entrances and activity along New Hampshire Avenue, within the Campus. In addition, the University has designed the building such that the less-intensive office uses—and their associated smaller windows and potential light impacts—are located on the west side of the Project, facing the residential properties across 24th Street. The University has also shifted the loading entrance along 24th Street further to the north, away from neighboring residential properties to the south and west, and has internalized loading and trash service within the Project.

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, because it eliminates the existing surface parking lot and its associated vehicle trips.

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, which calls for the dispersal of the University's parking supply into underground parking garages and maintenance of a minimum supply of 2,800 parking spaces. Users of the SPHHS are expected and will be encouraged to use public transportation, walk, or bike to the new building, or park in one of the University's nearby parking garages.

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 Foggy Bottom 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 as well as all other improvements currently pending before the Zoning Commission or under construction, the FAR for the residentially-zoned portions of the Campus will be 3.16, 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 its uses, height, density, lot occupancy, and open spaces are consistent with the approved Campus Plan.

E. No Interim Use of Land is Proposed

No interim use of land or property within the residentially-zoned areas near the campus is proposed as a part of this application.

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, as well as all other improvements currently pending before the Zoning Commission or under construction, 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

University representatives have 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. In addition, the SPHHS in particular will contribute to the public health in the District through the school's commitment to educational programs, innovative research, and service initiatives.

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 uses are consistent with the approved Campus Plan and are compatible with the nearby mix of 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 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 development of this site as a new home for the University' School of Public Health and Health Services will also satisfy goals and policies in the Comprehensive Plan related to health and human services. The Comprehensive Plan reaffirms the District's commitment to measures to advance public health and manage the changing nature of the health care delivery system. See CSF-2. The Plan also describes many of the health care challenges that face the District, including high rates of chronic disease and disability as well as a need for better access to affordable primary care services. See CSF-2.1. The SPHHS is already a partner with the District, working to improve access and affordability of care, while also providing on-going support for people with HIV. In addition, the partnership provides prevention efforts to reduce the incidence and prevalence of substance abuse (including tobacco) and reducing HIV transmission. Through the initiatives of the GW Hospital and the GW Medical Center, including SPHHS, the University will continue to work with the District to develop long-term sustainable solutions to these critical problems.

Implementation of the approved Campus Plan through this Project 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 Project will also further other citywide elements of the Comprehensive Plan, including the Transportation, Environmental Protection, Urban Design, and Parks and Open Spaces Elements.

- 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 bicycle storage, 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 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.
- The design of the proposed building provides an infill development of a strategic but underutilized site that will satisfy multiple goals of the Urban Design Element, including reinforcing the K Street gateway into District (UD-1.4.2); defining the vista along New Hampshire Avenue at its junction with Washington Circle (UD-1.4.3); using variation in architectural materials to transition from the residential Foggy Bottom neighborhood to the campus and business districts (UD-2.1.3); providing infill development that relates to the scale of surrounding buildings (UD-2.2.1, UD-2.2.7); designing attractive facades that create visual interest (UD-2.2.5)
- The Project's streetscape design will also fulfill Urban Design as well as Parks and Open Spaces goals through the provision of a revitalized streetscape and expansion of the public park at 24th Street and New Hampshire. See Policy PROS-4.3, UD-3; see also

UD-2.2.9 (protecting neighborhood open spaces and public areas). The use of the PUD process to encourage and incentivize the provision of such open spaces (as well as green roofs and other sustainable design features), is explicitly called for in the Comprehensive Plan. PROS-4.3.2; PROS-4.3.3.

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 removal of the University's surface parking supply, which will disperse parking, 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 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: December 27, 2010