THE DISTRICT OF COLUMBIA PUBLIC SCHOOLS AND THE GEORGE WASHINGTON UNIVERSITY

APPLICATION TO THE DISTRICT OF COLUMBIA ZONING
COMMISSION FOR CONSOLIDATED REVIEW AND APPROVAL OF A
PLANNED UNIT DEVELOPMENT AND AMENDMENT TO THE
ZONING MAP OF THE DISTRICT OF COLUMBIA

PRE-HEARING SUBMISSION

THE DISTRICT OF COLUMBIA PUBLIC SCHOOLS AND THE GEORGE WASHINGTON UNIVERSITY

APPLICATION TO THE DISTRICT OF COLUMBIA ZONING COMMISSION FOR CONSOLIDATED REVIEW AND APPROVAL OF A PLANNED UNIT DEVELOPMENT AND AMENDMENT TO THE ZONING MAP OF THE DISTRICT OF COLUMBIA

PRE-HEARING SUBMISSION

FILING DATE: JUNE 23, 2006

DEVELOPMENT TEAM

APPLICANT: The District of Columbia Public Schools

825 N. Capitol Street, NE

9th Floor

Washington, DC 20002

The George Washington University

2121 I Street, NW

Suite 701

Washington, DC 20052

ARCHITECTS, ENGINEERS AND CONSULTANTS:

Ehrenkrantz, Eckstut & Kuhn Architects

888 16th Street, NW

Suite 800

Washington, DC 20006

DMJM | CGS

3101 Wilson Blvd

Suite 900

Arlington, VA 22201

Golden Engineering

4455 Connecticut Avenue, NW

Suite A600

Washington, DC 20008

A. Morton Thomas and Associates, Inc.

12750 Twinbrook Parkway

Rockville, MD 20852

Wells & Associates

170 Jennifer Road

Suite 260

Annapolis, MD 21401

LAND USE COUNSEL:

Pillsbury Winthrop Shaw Pittman, LLP

2300 N Street, NW

Washington, DC 20037

Holland & Knight, LLP

2099 Pennsylvania Avenue, NW

Suite 100

Washington, DC 20006

TABLE OF CONTENTS

1.	INTRODUCTION							
	1.1	The Applicant	1					
	1.2	Summary of the Requested Action	2					
	1.3	Development Timeline	4					
2.	THE PROPOSED PROJECT							
	2.1	Site Location	4					
	2.2	Project Description						
	2.3	Development Parameters Under Existing & Proposed Zoning 5						
	2.4							
	2.5	Review by Commission of Fine Arts.	6					
	2.6	Review by Historic Preservation Review Board	6					
	2.7	Design Evolution	6					
3.	PLA	NNING ANALYSIS	7					
	3.1	Land Use Impact	7					
	3.2	Zoning Impact	7					
	3.3	Environmental Impact	7					
	3.4	Facilities Impact	7					
	3.5	The George Washington University Foggy Bottom Campus Plan	7					
4.	EVA	EVALUATION STANDARDS						
	4.1	Public Benefits & Project Amenities	8					
		4.1.1 Urban Design, Architecture, Landscaping and Open Spaces	8					
		4.1.2 Site Planning and Efficient and Economical Land Utilization	9					
		4.1.3 Effective and Safe Vehicular and Pedestrian Access	9					
		4.1.4 Historic Preservation of Private or Public Structures	9					
		4.1.5 Employment and Training Opportunities	9					
		4.1.6 Housing	9					
		4.1.7 Social Services/Facilities	10					
		4.1.8 Environmental Benefits	10					
4.		4.1.9 Uses of Special Value to the Neighborhood or the District						
		of Columbia as a Whole	4 5 6 6 6 6 7 7 7 7 7 8 8 8 8 9 9 9 10 10 10 10 11 11 11 11 11 11 11 11 11					
		4.1.10 Other Benefits Advancing the Themes of the Comprehensive Plan	10					
5.	COM	COMPLIANCE WITH MAJOR THEMES OF THE COMPREHENSIVE PLAN						
	5.1.	1. Stabilizing and Improving the District's Neighborhoods						
	5.2	Respecting and Improving the Physical Character of the District						
	5.3							
	5.4	Preserving the Historic Character of the District	12					
6.	CON	JCLUSION	12					

7. TABLE OF EXHIBITS

- A. Memorandum of Understanding
- B. Overview of Existing Programmatic Relationship
- C. Certification of Mailing a Notice of Intent to File a Zoning Application and an Amended Notice of Intent to File a Zoning Application
- D. List of Owners of Property Within 200 Feet of the Subject Property
- E. Existing Zoning & Location of Subject Property
- F. Proposed Zoning
- G. Existing and Future Ownership of Subject Property
- H. Architectural Drawings, Elevations & Context Photographs
 - H.1 Cover Sheet
 - H.2 General Information
 - H.3 Civil Site Plan
 - H.4 Existing Conditions Plan
 - H.5 Erosion and Sediment Control Plan
 - H.6 Stormwater Concept Plan
 - H.7 Stormwater Concept Calculations
 - H.8 Utility Layout Plan
 - H.9 Combined Architectural Site Plan
 - H.10 Circulation Plan
 - H.11 Landscape Plan
 - H.12 GW Residence Hall: Typical Parking Level Plan
 - H.13 GW Residence Hall: Lower Level Plan
 - H.14 GW Residence Hall: First Floor Plan
 - H.15 GW Residence Hall: 2nd-4th Floor Plan
 - H.16 GW Residence Hall: 5th-9th Floor Plan
 - H.17 GW Residence Hall: 10th Floor Plan
 - H.18 GW Residence Hall: Roof Plan
 - H.19 School Without Walls: Cellar Plan
 - H.20 School Without Walls: First Floor Plan
 - H.21 School Without Walls: Second Floor Plan
 - H.22 School Without Walls: Third Floor Plan
 - H.23 School Without Walls: Fourth Floor Plan
 - H.24 School Without Walls: Roof Plan
 - H.25 Section AA
 - H.26 Section BB
 - H.27 Section CC
 - H.28 Section DD
 - H.29 F Street Elevation
 - H.30 F Street Elevation Rendering
 - H.31 22nd Street Elevation
 - H.32 East Elevation
 - H.33 G Street Elevation
 - H.34 G Street Elevation Rendering
 - H.35 View from F Street
 - H.36 Views from G Street
 - H.37 Site Context F Street
 - H.38 Site Context G Street
- I. Tabulation of Development Data
- J. Commission of Fine Arts Concept Approval Letters

- K. Traffic Study
- Statement of Compliance with the Filing Requirements for a Consolidated PUD Application and Zoning Map Amendment
 List of Hearing Witnesses L.
- Μ.
- N. Outline of Witness Testimony

I. INTRODUCTION

The District of Columbia Public Schools ("DCPS") and The George Washington University ("GW" or "the University") [jointly the "Applicant" or "the Parties"] have entered into a Memorandum of Understanding ("MOU") for the modernization and addition to the School Without Walls ("SWW"), formerly known as The Ulysses S. Grant School, by DCPS and the construction of a new undergraduate residence hall by GW through a joint Planned Unit Development ("PUD") process [Exhibit A: Memorandum of Understanding].

This DCPS/GW partnership furthers key goals of the Parties by providing funding to DCPS for the modernization and expansion of an aging school that lacks many of the infrastructure capabilities required for excellent delivery of education and a state-of-the-art classroom experience, and by assisting the University in achieving its goal of providing additional undergraduate housing within the Foggy Bottom Campus Plan boundaries through the construction of a new undergraduate residence hall.

The MOU also enhances the Parties' long standing programmatic relationship [Exhibit B: Overview of Existing Programmatic Relationship]. As a part of the agreement, the Parties have formed a taskforce to further this partnership, termed the "Partnership for a Learning Community", with the goal of establishing SWW as one of the premier high schools in the nation. This enhanced programmatic partnership will:

- Develop innovative programs for the education of students at both institutions, including the preparation of high school students for higher education experiences;
- Create synergistic relationships that build upon the strengths of both institutions; and
- Identify and refine successful educational strategies that could serve as a model for other high schools, as well as other collaborative efforts between high schools and universities generally.

The Parties have filed this application for the consolidated review and approval of a PUD and amendment to the Zoning Map, including all of the requisite elements and providing the required notices, in order to facilitate the execution of the agreement between the parties – including furthering the programmatic partnership and delivering these key development projects. [Exhibit C: Certification of Mailing a Notice of Intent to File a Zoning Application and an Amended Notice of Intent to File a Zoning Application and Exhibit D: List of Owners of Property Within 200 Feet of the Subject Property]

1.1 The Applicant

DCPS operates 167 schools and learning centers within the District of Columbia. The School Without Walls is a non-traditional high school established in 1971 and modeled after the successful Parkway Program in the school district of Philadelphia. SWW is located at 2130 G Street, NW within The George Washington University's Foggy Bottom Campus Plan boundaries. SWW provides a quality student-centered environment that maximizes integrative, interactive, experiential learning within the framework of a humanities approach. This is achieved by using the "city as a classroom" and the school experience as a model of collaboration among staff, students and parents.

The George Washington University, founded in 1821 and rooted in the Foggy Bottom community 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. The University's Foggy Bottom campus is generally bounded by Pennsylvania Avenue to the north, 19th and 20th Streets to the east, E and F Streets to the south and 24th Street to the west, and is adjacent to a variety of institutional, commercial and residential uses.

1.2 Summary of the Requested Action

The Parties have filed this application for the consolidated review and approval of a Planned Unit Development (PUD) and corresponding amendment to the Zoning Map in order to facilitate the modernization and expansion of the SWW and the construction of a residence hall by the University – projects critical to meeting the strategic goals of both institutions.

DCPS Master Education Plan

The mission of DCPS is to ensure all students acquire the knowledge, skills and values necessary to live rich and fulfilling lives as responsible, productive and enlightened members of a democratic society. The Master Education Plan (MEP) recently released by DCPS provides "a picture of progress to date and identifies steps DCPS must take to achieve sustainable, systemic reform." It also lays the groundwork for further discussion of how DCPS can best use its facilities and other resources to "support the necessary changes and provide safe, healthy and effective learning environments for our students over the long term." One of the primary goals of the MEP is to lay out the educational framework and provide policy guidance for the development of a new Master Facilities Plan (MFP), which will provide a plan for modernizing DCPS' public facilities.

The renovation and addition to the School Without Walls is an example of a creative solution for modernizing DCPS' ailing school facilities through the creation of a public/private development partnership, providing an enhanced learning environment for the SWW community and allowing DCPS' capital resources to be invested in other schools within the DCPS system.

The George Washington University Foggy Bottom Campus Plan

Under GW's existing Foggy Bottom Campus Plan: 2000-2009 (as well as the recently filed Foggy Bottom Campus Plan: 2006-2025), the University is required to provide housing for 70% of full-time Foggy Bottom undergraduates up to an enrollment of 8,000 and one bed for each full-time Foggy Bottom undergraduate over 8,000. This requirement comes into effect in fall 2006 and the University plans to be in compliance with the housing condition at that time. Since the adoption of the 2000 Campus Plan, the University has followed a building program that has added more than 2,000 undergraduate beds on its Foggy Bottom campus in order to both address student demand for on-campus housing and achieve compliance with this condition. The residence hall to be constructed under the proposed PUD will assist GW in continuing to meet its housing commitment in future years as the University renovates certain existing residence halls and transitions several off-campus residence halls to uses other than undergraduate student housing.

The property on which the residence hall is to be constructed was identified as a "preferred site" for development of student housing in the existing Foggy Bottom Campus Plan. The plan, however, envisioned fewer beds on this site because the development was confined to GW-owned property (the location of the existing tennis courts). Through the purchase of DCPS property negotiated under the MOU the University is able to increase the number of beds on the site.

The Applicant owns the proposed site, which includes Lots 829 and 55 in Square 80 (the "Subject Property"). The Subject Property includes approximately 45,689 square feet of land area and is located in the R-5-D Zone District [Exhibit E: Existing Zoning & Location of Subject Property and Exhibit F: Existing and Future Ownership of Subject Property]. The Subject Property is currently improved with the SWW building, a parking lot for the SWW and two GW-owned tennis courts. In this application, the Parties propose the renovation/modernization of the existing SWW structure, as well as an addition to the existing building with gross floor area of approximately 25,298 square feet (resulting in a total gross floor area of the SWW building [existing and new construction] of approximately 49,578 square feet) and the construction of a new GW undergraduate residence hall with total gross floor area of approximately 183,119 square feet (the "Proposed Project").

The Map Amendment requests the Subject Property be rezoned to the SP-2 Zone District [Exhibit G: Proposed Zoning]. This rezoning is appropriate given the adjacent uses, the proposed joint institutional uses on the Property, and the characterization of the SP-2 District as a mixed-use zone creating a buffer between residential and other uses. Further, achieving the SP-2 zoning will allow the maximum value to be transferred from GW to DCPS from the development rights generated by the rezoning requested as a part of this PUD¹.

The Proposed Project will provide important public benefits to the Foggy Bottom community, as well as the District of Columbia as a whole, including:

- 1. Providing funding in the amount of approximately \$12 million to DCPS for the modernization and expansion of the SWW;
- 2. Enhancing the long standing public-private partnership between GW and SWW, including current programs that provide for the sharing of facilities, grant SWW students access to GW classes on a tuition-free basis, provide internships for both GW and SWW students, and offer teaching and other programmatic collaborations;
- 3. Furthering the goals of the Comprehensive Plan for the modernization of public facilities;
- 4. Achieving substantial preservation of the existing SWW building;
- 5. Delivering approximately 474 new beds within the Foggy Bottom Campus Plan boundaries an increase of approximately 224 beds above the number identified for development on this site under the existing Foggy Bottom Campus Plan;
- 6. Providing a building layout that encourages GW students to approach the residence hall structure from the interior of the campus utilizing an inner-block pedestrian pathway;
- 7. Improving streetscape on both G and F Streets, with F Street improvements to be constructed to conform with the University's streetscape plan currently under development in conjunction with the *Foggy Bottom Campus Plan: 2006-2025*; and
- 8. Constructing a project that offers superior design, attractive landscaping and creation of unique and usable open spaces.

For the above reasons, the approval of this PUD application and Zoning Map Amendment will provide the requisite public benefits and promote orderly development in conformity with the District of Columbia zone plan as embodied in the Zoning Regulations and Map of the District of Columbia.

¹ Under the MOU between DCPS and GW, the University will compensate DCPS for additional development rights generated by rezoning to SP-2 under the PUD, which will remove the development from the aggregate floor-area-ratio cap that applies to residentially-zoned land within the Foggy Bottom Campus Plan boundaries.

1.3 Development Timeline

The Applicant will undertake the proposed development as two separate construction projects. The University needs to begin construction in summer 2007 in order to enable the delivery of the residence hall in fall 2009. Likewise, DCPS also expects to begin construction on the school modernization and addition in 2007 and anticipates completion of the improvements by 2009.

2. THE PROPOSED PROJECT

2.1 Site Location

The Subject Property is located within GW's Foggy Bottom Campus Plan boundaries and comprises approximately 45,689 square feet of land owned by the University and DCPS. It is situated in the Square 80 block reaching from G Street to the north to F Street to the south. As shown in the photographs included as *Exhibit H.37 and H.38*, the area surrounding the Subject Property is characterized by University uses, medium-to-high-density residential uses and government/institutional uses. A number of high-rise apartment buildings, government office buildings and University buildings are located in close proximity to the site.

2.2 Project Description

The Proposed Project includes two construction projects: the modernization and expansion of the SWW by DCPS and the construction of a new residence hall by GW. The SWW addition will provide additional classroom, laboratory and auxiliary facilities and also proposes a much needed outdoor space. The GW residence hall project will provide approximately 474 additional beds for undergraduate student housing on the Foggy Bottom campus, as well as approximately 178 belowgrade parking spaces (including valet). The typical residential units include four single-bedrooms, two bathrooms and shared kitchen and living areas [Exhibit H.13-17].

The DCPS project will provide approximately 25,298 square feet of additional above-grade space for SWW, resulting in a total building of approximately 49,578 square feet of gross floor area. The GW project will deliver approximately 183,119 square feet of gross floor area.

In order to facilitate these development projects the Applicant will be requesting relief from the following Zoning Regulations, as further illustrated in Section 2.3 below:

• Rear-Yard Requirement

In order to provide maximum housing on the site and allow for the substantial preservation of the existing SWW structure, the two buildings will abut and neither will provide for a rear yard.

• Closed Court Width and Area

In order to maximize student housing on the site and provide the required light and ventilation to the residential units, three closed courts are provided in the GW structure. The inner closed court meets the court width and area requirements; the outer courts will require relief from the requirements to provide the required light and air to the residential units.

• <u>Penthouse Setback</u>

The SWW addition will require relief from the Penthouse setback requirement, given the size and shape of the floor plate required to construct an addition that is located adjacent to the existing structure and respects the character of the existing SWW building.

• Residential Recreation Space

The GW project does not provide the level of residential recreation space specified under the SP-2 zone. The building, however, is located within GW's Foggy Bottom campus, which provides adequate recreation and outdoor space for the University population.

• Lot Coverage

As a result of the historic nature of the existing School Without Walls structure, the adaptive re-use of this building requires an addition that is sensitive to the existing elements of the structure, including sensitivity to the structure's existing height and prominence of the roof tower. In order to maintain the focal elements of the existing structure, the design of the addition must be developed outside of the existing building footprint resulting in a need for minor relief from the lot coverage maximum in the SP-2 zone.

2.3 Development Parameters Under Existing & Proposed Zoning

The following table summarizes the development parameters under the existing and proposed zoning as well as the development proposed in this PUD application. *Exhibit I: Tabulation of Development Data* provides additional information regarding development on the site.

	Maximum Development/	Maximum Development/	Proposed Design		
	Requirements Under a	Requirements Under a		Тторозей Бе	
	PUD in the Existing	PUD in the Proposed SP-2	DCPS		Joint PUD
	R-5-D Zone	Zone	Project	GW Project	Joint 1 CD
Height	90 feet	90 feet	88 feet, 10 inches	90 feet	Up to 90 feet
Lot Occupancy	75%	80%	87.04%	74.56%	80.33%
Rear Yard	3 in. per ft. of height, but not less than 15 ft.	2.5 in. per ft. of height, but not less than 12 ft.	0 feet	0 feet	0 feet
Side Yard	None, but if provided, 3 in. per ft. of height, but not less than 8 ft.	None, but if provided, 2 in. per ft. of height, but not less than 8 ft.	None	None	None
Penthouse Setback	1:1 for height of structure, not to exceed 18 feet, 6 inches high	1:1 for height of structure, not to exceed 18 feet, 6 inches high	Relief Requested	Complies	Relief Requested (SWW)
Parking	None Req'd Pursuant to Section 2100.5 (SWW) Aggregated under Campus Plan (GW)	None Req'd Pursuant to Section 2100.5 (SWW) Aggregated under Campus Plan (GW)	0 spaces	178 spaces (incl. valet)	178 spaces (incl. valet) (GW)
Court Width & Area (Closed)	Width: 4" per ft. of court height, but not less than 10 ft; Area: twice the square of the required width, but not less than 350 sq. ft.	Width: 4" per ft. of court height, but not less than 10 ft; Area: twice the square of the required width, but not less than 350 sq. ft.	None	Inner – complies; Outer – Relief Requested	Relief Requested (GW)
Court Width (Open)	3" per ft. of court height; not less than 10 ft.	3" per ft. of court height; not less than 12 ft. (non- residential)	Relief Requested	None	Relief Requested (SWW)
FAR (under PUD)	4.5	6.5			5.09

2.4 Flexibility Under the PUD Guidelines

The PUD process provides for the flexibility required to accomplish the development set forth in this proposal in return for meeting District and neighborhood planning goals and objectives. As set forth above, the Applicant is requesting relief from the lot occupancy, rear yard, penthouse setback, closed court width and area, parking, and residential recreation space requirements set forth under the Zoning Regulations. In accordance with DCMR 2401.2 (a) and (b), the Applicant believes this flexibility is warranted because the Proposed Project is of exceptional merit and is in the best interests of both the District and the Foggy Bottom neighborhood.

2.5 Review by Commission of Fine Arts

The Commission of Fine Arts (CFA) has jurisdiction over both the GW and DCPS portions of the development on the Subject Property². In accordance with the process for CFA review, the Applicant has undergone concept review by CFA and both elements of the Proposed Project have received concept approval from the Commission [Exhibit J: Commission of Fine Arts Concept Approval Letters]. The applicant will continue consultation with the CFA, as necessary, as the project design further develops during the regulatory process.

2.6 Review by Historic Preservation Review Board

In May 2006, the Historic Preservation Review Board (HPRB) designated the existing School Without Walls structure (formerly known as The Ulysses S. Grant School) as a historic landmark listed in the DC Inventory of Historic Sites and recommended its inclusion in the National Register of Historic Places. In order to address the historic significance of the existing SWW structure, DCPS has developed a design that substantially maintains all four of the existing exterior walls, respects the original structure's presence on G Street and differentiates the new structure from the existing one. The Applicant has worked extensively with Historic Preservation Office staff in the development of its design and will continue to address issues raised with respect to historic considerations associated with redevelopment of the site. HPRB is scheduled to consider the design concept for the SWW addition at its June 22nd meeting.

2.7 Design Evolution

The Applicant has undergone extensive consultation with CFA and Historic Preservation Office staff with respect to the design of the Proposed Project. In addition, the applicant has consulted with the Office of Planning on design and context issues associated with the Proposed Project and its relationship with GW's proposed Foggy Bottom Campus Plan: 2006-2025 which is scheduled for public hearing before the Zoning Commission in September 2006. The Applicant will continue to refine the project design based upon additional input and guidance received from the aforementioned agencies and the Zoning Commission as the regulatory process continues.

² CFA jurisdiction over the GW and DCPS portions of the Proposed Project is pursuant to the Shipstead-Luce Act (1930) and Executive Order 1259 (1910), respectively.

3. PLANNING ANALYSIS

3.1 Land Use Impact

The Subject Property is comprised of a surface parking lot, the existing SWW building and two GW tennis courts. The proposed GW residence hall and the expanded SWW are appropriate improvements for the Subject Property from a land use perspective, as they comply with existing use patterns and designated uses for the site. The Subject Property is located within the Foggy Bottom Campus Plan boundaries and is located in the area designated for institutional use on the District of Columbia Generalized Land Use Map. This designation is consistent with the proposed SP-2 zoning to facilitate continued institutional use of the site.

3.2 Zoning Impact

The proposed rezoning of the Subject Property to the SP-2 District fulfills the goals and objectives of the DC Comprehensive Plan. The Subject Property is located adjacent to a square that includes SP-2 zones and is consistent with the development's mixed residential and institutional uses. The location of the site is consistent with proposed zoning as the site provides a buffer between existing private residential and existing/future institutional uses. Further, SP-2 zoning is not inconsistent with the Comprehensive Plan Generalized Land Use Map designation.

3.3 Environmental Impact

As more specifically detailed in Exhibit H.5-8, the proposed construction will not result in an adverse environmental impact. The increased use of water and sanitary services that will occur as a result of this project will have an inconsequential effect on the District's delivery systems. The Subject Property is currently served by all major utilities. The project's proposed storm water management and erosion control plans will minimize impact on the adjacent property and existing storm water systems. The erosion control procedures stipulated by the District will be implemented during construction of the project.

3.4 Facilities Impact

The Proposed Project will not have an adverse impact on the public facilities on which it will rely for service. As previously mentioned, the Subject Property is located within The George Washington University's Foggy Bottom Campus Plan boundaries. Accordingly, the residents of the residence hall will not be required to drive to classes and other GW activities. Further, the Subject Property is adequately served by public transportation as it is located within walking distance of the Foggy Bottom/GWU and Farragut West Metrorail stations and numerous Metrobus lines servicing the area.

3.5 The George Washington University Foggy Bottom Campus Plan

The Proposed Project is consistent with the Foggy Bottom Campus Plan: 2000-2009, as well as the proposed Foggy Bottom Campus Plan: 2006-2025 (scheduled for public hearing before the Zoning Commission in September 2006), as both plans designate the Subject Property for residential development. The addition of the proposed on-campus beds will assist the University in ensuring long-term compliance with the housing condition of the Campus Plan that becomes effective in fall

2006. Furthermore, the development will offer approximately 178 parking spaces (including valet) in accordance with the University's efforts to redistribute parking throughout the campus and facilitate the future redevelopment of the existing above-grade University Parking Garage on Square 55 for academic use, as proposed in The Foggy Bottom Campus Plan: 2006-2025.

4. EVALUATION STANDARDS

Section 2403 of the Zoning Regulations provides the standards for evaluating a PUD application. According to this regulation, the project must provide superior public benefits and project amenities, comply with the Comprehensive Plan, and provide an acceptable impact on city services and facilities. In deciding a PUD application:

...the Commission shall judge, balance and reconcile the relative value of the project amenities and public benefits offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case. (11 DCMR 2403.8)

In this case, the balance weighs strongly in favor of approval of the Proposed Project. The Proposed Project offers significant public benefits in the form of housing additional GW students on the Foggy Bottom campus, a use that is of special importance to the Foggy Bottom neighborhood, and renovating the public facility at the School Without Walls, providing benefits to the District as a whole. Furthermore, the new structures will be constructed to enhance the urban design and attractive landscaping of the space. The parking that is proposed as a part of the GW residence hall will also serve as a key element of GW's parking phasing plan and will help to facilitate the future redevelopment of the existing above-grade University Parking Garage (as proposed in the Foggy Bottom Campus Plan: 2006-2025), further enhancing the attractive design and atmosphere of the neighborhood and the campus. The project also complies with the use categories outlined in the existing Foggy Bottom Campus Plan: 2000-2009, as well as the proposed Foggy Bottom Campus Plan: 2006-2025.

4.1 Public Benefits & 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 applicants greater flexibility in planning and design than may be possible under matter-of-right zoning. The Proposed Project provides a variety of public benefits, as outlined below.

4.1.1 Urban Design, Architecture, Landscaping and Open Spaces

In accordance with Section 2403.9(a) the Proposed Project provides exceptional design, increased landscaping and the creation of unique and usable open spaces. The SWW project will include an addition to the existing building that respects the historic character of the original structure, while also providing the SWW with much needed and highly attractive outdoor space. The GW residence hall also offers attractive design that is contextually sensitive and complements existing nearby structures. The GW development also creates an interior courtyard that offers an alternate entrance to the building from the center of campus.

4.1.2 Site Planning and Efficient and Economical Land Utilization

In accordance with Section 2403.9(b) the Proposed Development offers a comprehensive site plan that maximizes the utilization of land, while remaining sensitive to the existing built environment. The Proposed Project provides further efficiency in land utilization through rezoning to the SP-2 zone, which is most appropriate to the mixed-use nature of the project as well as the site's location, which positions the site as a buffer between residential and institutional uses. Further, the additional density provided through the rezoning allows for the efficient delivery of undergraduate student housing within the Foggy Bottom campus boundaries, which is highly desirable to the University and a priority for residents of the Foggy Bottom community.

4.1.3 Effective and Safe Vehicular and Pedestrian Access

In accordance with Section 2403.9(c), the Proposed Project (as a part of the University's long-term development and parking plans which are further outlined in *the Foggy Bottom Campus Plan: 2006-2025*) will have a positive impact on the overall transportation infrastructure in the area. This new Campus Plan proposes that parking be distributed throughout the campus, as opposed to being concentrated at the existing University Parking Garage. Further, the Proposed Project will provide GW students an alternative entrance to the residence hall from the center of campus. [Exhibit K: Traffic Study provides a comprehensive analysis of vehicular and pedestrian traffic issues.]

4.1.4 Historic Preservation of Private or Public Structures

In accordance with Section 2403.9(d), the Proposed Project will achieve the preservation of historic structures in the District. As mentioned previously, the existing SWW building has been designated as a historic landmark. Accordingly, the SWW development has been designed to meet the program requirements on the site in a manner that substantially preserves the four exterior walls of the existing structure and proposes an addition that is contextually sensitive and differentiates itself from the existing structure. Also as mentioned previously, HPRB will be considering the design concept for the SWW at its June 22, 2006 meeting.

4.1.5 Employment and Training Opportunities

In accordance with Section 2403.9(e), the expansion of the School Without Walls will increase public educational opportunities available to children in the District of Columbia. The Proposed Project also will result in additional employment opportunities for DC public school teachers. The enhanced programmatic relationship with GW will further increase opportunities for both teachers and students. Further, construction of the two projects will offer employment in the District during the development and construction phases.

4.1.6 Housing

In accordance with Section 2403.9(f), the Proposed Project will provide housing for approximately 474 GW undergraduate students. The existing Foggy Bottom Campus Plan

identified this site as a preferred location for a residence hall that was to include approximately 250 beds. The approval of the proposed PUD and map amendment provides the benefit of approximately 224 additional beds with virtually no additional impact.

4.1.7 Social Services/Facilities

In accordance with Section 2403.9(g), the Proposed Project achieves the modernization and expansion of a District of Columbia public facility in the form of the School Without Walls. This renovation is made possible by the MOU between DCPS and GW [provided in *Exhibit A*], which provides funds for renovations - allowing DCPS to maximize the use of its other resources to benefit other schools within the DCPS system. This Proposed Project also provides social services in the form of enhanced delivery of secondary education to residents of the District.

4.1.8 Environmental Benefits

In accordance with Section 2403.9(h), the Proposed Project provides the environmental benefits of providing two new unique and usable open spaces – an outdoor terrace for the School Without Walls and a residential courtyard for the GW residence hall.

4.1.9 Uses of Special Value to the Neighborhood or the District of Columbia as a Whole

The Proposed Project offers two specific uses of special value: the addition of on-campus housing for GW students (a use that is of special value to the Foggy Bottom neighborhood) and the renovation of the public SWW facility, a noted priority under the DC Comprehensive Plan.

4.1.10 Other Benefits Advancing the Themes of the Comprehensive Plan

Other benefits provided by the Proposed Project that further the themes of the Comprehensive Plan are outlined in Section 5 below.

5. COMPLIANCE WITH MAJOR THEMES OF THE COMPREHENSIVE PLAN

The Proposed Project furthers the goals and policies stated in the District of Columbia Comprehensive Plan ("Comprehensive Plan") D.C. Law 12-275, 10 DCMR (Planning and Development) 100 et seq. (1998), specifically those outlined as follows:

5.1 Stabilizing and Improving the District's Neighborhoods

The Proposed Project serves the purpose of improving the neighborhood by both providing additional on-campus housing for GW undergraduate students as well as improving the School Without Walls, a public facility, which under the DC Comprehensive Plan should be "stabilized and improved" (102.3).

The modernization and construction of the School Without Walls through the public/private partnership is an outstanding example of a project that aligns with the District's plan for

"rehabilitation and modernization" of public schools, specifically addressing the District's desire to develop "alternative capital financing and public facility construction techniques" (602.2(d)) and to "[maximize] the public benefits derived from the disposition of surplus public property." (607.1). Through this Proposed Project, DCPS will modernize and expand the aging School Without Walls building through an agreement with GW that will provide maximum financial value to DCPS while continuing a long-standing programmatic partnership between the two entities aimed at establishing the SWW as one of the nation's premiere high schools.

5.2 Respecting and Improving the Physical Character of the District

The design of the Proposed Project reflects the unique character of the two development projects under the PUD. The modernization and expansion of the School Without Walls will respect the existing SWW building while offering unique design that reinforces the character of G Street and complements the existing structure. The GW residence hall project has been designed to respect and complement the character of F Street, using materials that reflect the scale of the adjacent townhouses while also complementing the design of existing high-density residential structures featured along F Street to the east and south.

5.3 Preserving and Ensuring Community Input

The Proposed Project has been developed with the benefit of input from a variety of community stakeholders. DCPS has consulted extensively with its internal community, including the SWW Home and School Association and Local School Restructuring Team, as well as other SWW advisory groups. GW has included discussion of a residence hall development on the site in connection with a number of community outreach activities including the community-based planning process that took place during the summer and fall of 2005 as a part of GW's Foggy Bottom Campus Plan: 2006-2025 community outreach efforts. In addition, the Parties convened a joint DCPS/GW open community meeting on March 23, 2006 to provide interested parties with information on the Proposed Project.

Further, all information provided during the University's community-based planning process, and the presentation-related materials discussed at the joint open community meeting in March are available online at www.neighborhood.gwu.edu. In order to continue to provide information to interested stakeholders, the Applicant will include a section on the aforementioned website dedicated to information on the Proposed Project and will also continue to provide project-related information to DCPS stakeholders through various methods.

In addition, the Advisory Neighborhood Commission 2A (ANC-2A) considered the issue of adaptive reuse of the existing School Without Walls structure at its June 14, 2006 meeting and voted unanimously to "support the concept of adaptive reuse of the U.S. Grant School/School Without Walls" and took no position on the appropriateness of the building's design stating that "the Commission does not have the expertise to evaluate this proposal from a historic preservation perspective."

5.4 Preserving the Historic Character of the District

The Proposed Project includes the substantial preservation of the existing School Without Walls building, formerly known as The Grant School. *Exhibit H: Architectural Drawings, Elevations and Context Photographs* provides drawings reflecting the planned addition and modification to the SWW building.

6. CONCLUSION

For the aforementioned reasons, this consolidated PUD and Zoning Map amendment request meets the standards of Chapter 24 of the Zoning Regulations; is consistent with the purposes and intent of the Zoning Regulations and Map; enhances the general welfare of the residents of the District of Columbia; satisfies the requirements for approval of the consolidated PUD and Zoning Map amendment; provides significant public benefits; and advances important policies and goals of the District of Columbia. Therefore, the Applicant respectfully requests the PUD application and Zoning Map amendment be approved and adopted by the Zoning Commission.