

March 4, 2011

VIA HAND DELIVERY

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

Re: **Z.C. Case No. 06-11B/06-12B**
GW Foggy Bottom Campus Plan / PUD – Square 55
Supplemental Pre-Hearing Statement of the University

Dear Chairman Hood and Members of the Commission:

Pursuant to 11 DCMR Section 3013.8, The George Washington University (“University”) hereby files the following supplemental information for the above-referenced case, which is to permit the construction of a new Science and Engineering Complex (“SEC”) at the core of the University’s Foggy Bottom campus.

I. Revised Plans

The University’s design team has refined the SEC’s design in response to the comments and direction offered by the Commission at setdown and in consultation with representatives of the Office of Planning. Attached as Exhibit A is a full set of updated plans, which contain revised elevations and perspectives that depict the changes to the building facades and building entrances made in response to the Commission’s concerns. (See pages A30-39 – revised perspectives of building and entrances; page A43 – revised 22nd Street elevation; A54-59 – revised sections of building entrances.) Samples of the proposed materials and a model will be provided at the hearing in order to further clarify the design and function of the proposed Project.

II. Parking Plan

As discussed in the January 7 prehearing submission, immediately following approval of the 2007 Foggy Bottom Campus Plan, the University began to implement a strategy for replacing the existing parking associated with the University Parking Garage, which will be demolished to accommodate the SEC. Upon completion of the SEC, the University’s total parking capacity will exceed 3,300 parking spaces (including valet), which exceeds the required minimum of

2,800 spaces and roughly corresponds with the 3,450 parking spaces (including valet) that were provided on campus at the time of approval of the 2007 Foggy Bottom Campus Plan.

In order to conduct demolition activity during the least disruptive time, the University will begin to raze the UPG this summer (Summer 2011). Since the additional parking supply associated with the Square 103 parking garage will not be completed until Summer 2012, during this interim period of approximately one year the University's on-campus parking supply will drop to approximately 2,541 spaces, which is below the Campus Plan minimum of 2,800 parking spaces. In order to address this shortfall, the University will accommodate parking needs and meet its required parking minimum through the interim use of off-campus parking resources, which was explicitly recognized by the Commission in the 2007 Campus Plan / PUD Order.

Specifically, the University is negotiating a lease with the parking operator for the Kennedy Center for the Performing Arts (which is located a few blocks southwest of campus) to permit the use of Kennedy Center parking by the University during the day, when University demand is at its peak and Kennedy Center demand is correspondingly low. The lease will permit the use of approximately 350-500 parking spaces, which will bring the total amount of parking provided by the University to at least 2,891-3,041 spaces, which is above the 2,800 minimum.

Access to the Kennedy Center spaces is currently provided via an existing shuttle bus service that is operated by the Kennedy Center from the Foggy Bottom-GWU Metrorail station. See shuttle route diagram attached as Exhibit B. This free shuttle route runs every 15 minutes from 9:45 AM to midnight, Monday through Friday as well as from 10 AM to midnight on Saturdays and noon to midnight on Sundays.

The University will supplement this shuttle service with additional service that will help transport GW faculty and staff to/from the campus, as required by demand. The University is in the process of finalizing the route and timing of this additional shuttle service but expects that the GW shuttle will offer service at intervals of approximately 15 minutes during peak times and use the route shown on Exhibit B in order to avoid impact on nearby residential areas.

Once the Square 103 garage is completed in Summer 2012, the University will bring online 392 underground parking spaces as well as 58 interim surface spaces that will bring the total number of spaces on campus to approximately 2,985 spaces. While the SEC is being constructed, the University will continue to maintain the lease at the Kennedy Center, which will allow access to a reduced number of additional parking spaces as needed.

When the SEC is completed in Spring 2015, the University will provide a total of approximately 3,306 on-campus parking spaces and discontinue its lease agreement with the parking operator at the Kennedy Center.

III. ANC 2A Report

The University presented the Project to Advisory Neighborhood Commission (ANC) 2A at its October 2010 regular public meeting and again at its February 2011 public meeting. Following the second presentation, the ANC then considered and approved a resolution laying out a series of concerns. Below please find the University's response to each issue raised by ANC 2A.

A. Community Amenities

ANC 2A expressed concern that the amenities associated with the PUD were insufficient given the change in zoning and related flexibility permitted as a part of the PUD process. The ANC misunderstands, however, the two-step process associated with the development of the Foggy Bottom campus, which approved the amenities as well as the zoning and development flexibility during the first step, and limits the consideration at the second step to how the specific Project conforms to the first stage approval.

During the year-long community-based planning process associated with the development of the Campus Plan / PUD, the University worked diligently with many representatives from the surrounding Foggy Bottom and West End communities—including then-representatives of ANC 2A—to identify the benefits and amenities that were desired by surrounding residents. The result of this process was a remarkably bold and innovative campus plan that embraced a “Grow Up, Not Out” strategy to concentrate growth/development at the core of the campus and limit GW growth into surrounding residential areas, while also providing amenities that would be implemented on a project-by-project basis such as the streetscape plan, retail corridor along I Street, and a sustainable design commitment. Of particular note, the amenities package included a commitment by the University not to acquire off-campus residential properties in Foggy Bottom/West End and transition these properties to University use, as well as the University's commitment to, over time, phase out its use of off-campus properties for undergraduate housing. Most notably, perhaps, the package included a commitment to create a campus historic district that was lauded by Zoning Commissioners themselves as a “fairly enormous amenity” that was “one of the most significant proffers” the Commission had ever received.

During its consideration of the First-Stage PUD, the Commission weighed the value of these benefits and amenities against the height, density, and zoning requested by GW for the entire campus, which focused growth at the core of the campus and away from surrounding residential neighborhoods. After a protracted hearing process that included extensive testimony from OP, HPO, DDOT, and community members in support of many of these amenities, the Commission ultimately concluded that the proposed height, density, zoning and planning flexibility afforded by the PUD was appropriate given the project amenities and benefits of the PUD, and also determined that the impacts associated with the PUD were commensurate with these benefits.

On appeal, in response to a specific challenge concerning the adequacy of the amenities, the D.C. Court of Appeals affirmed the Commission's findings regarding the sufficiency of the amenities package based on substantial evidence that the amenities "outweighed the potential drawbacks of more concentrated development in the Foggy Bottom area." Therefore, the Commission has already confirmed that the site-specific zoning, height, and density for Square 55 as well as the other development sites are appropriate because of the exceptional amenities package set forth above and the D.C. Court of Appeals has affirmed that decision.

Further consideration of the amenities package is not only unnecessary but also inappropriate given the extent to which GW has already implemented many of these proffers. While some of the benefits of the Campus Plan / PUD are implemented on a project-by-project basis (such as the transportation, retail, sustainable design, streetscape improvement, and exemplary architecture amenities that the ANC recognized in its report), many of the more significant amenities, such as the preservation plan and the commitments regarding off-campus properties, are being implemented separate and apart from any second-stage development.

Furthermore, in many cases the implementation has already taken place. To date, for example, the University has transitioned the use of the Hall on Virginia Avenue and the Aston—two off-campus residence halls—to uses other than undergraduate housing, as called for under the Plan. The one remaining off-campus undergraduate residence hall, City Hall, is scheduled to be transitioned from undergraduate housing in 2016, as outlined in the Plan. Additionally, GW successfully nominated six properties for designation as historic landmarks, and provided the Historic Preservation Office with the background information needed to process approval of the campus historic district. In addition, the University has refrained from purchasing residentially zoned property outside of the Campus Plan boundaries in the Foggy Bottom/West End Area, and has instead pursued its "grow up, not out" strategy through pursuit of this and other projects.

Therefore, for all of the reasons discussed above, the University respectfully disagrees with the ANC's contentions regarding the amenities package. The campuswide amenities defined during the first stage PUD process, as provided on a campuswide basis or through the site-specific development such as projects like Square 55, are more than ample to justify the height, density, and flexibility associated with the University's Campus Plan / PUD and the community is precluded from re-litigating that issue by virtue of the D.C. Court of Appeals' decision.

B. Second Metro Entrance

ANC 2A requested that GW help expedite and fund a second entrance to the Foggy Bottom-GWU Metrorail station as an additional public benefit of the PUD. As discussed in detail above, the Zoning Commission has already established that a significant series of amenities and benefits as a part of the campuswide PUD, and GW has already begun to implement many of these amenities. No additional amenities are needed to justify the buildout of the PUD.

Furthermore, GW did agree to take measures to promote the creation of a second Metro entrance as a part of the campus plan / first stage PUD proceedings in 2006-2007. Specifically, GW agreed that its future development of Square 77 would not preclude accommodation of a second Metro entrance at the southeast corner of the 22nd and I Street intersection, across 22nd Street from the Project. The University agreed that at the time GW seeks to redevelop this area of Square 77, the University would actively coordinate with WMATA to ensure accommodations were made to permit the construction of an entrance by WMATA either concurrent to or at some point following the GW development. The University has also coordinated with WMATA to ensure that the construction proposed for the SEC does not inhibit or encumber a future entrance, to the extent this can be identified from current WMATA plans.

C. Transportation Planning

ANC 2A expressed concern regarding pedestrian mobility and safety surrounding the Project. As was discussed in detail in the initial application package in this matter and shown on the plans included at that time and reprinted as Exhibit A to this filing, the project will provide a series of significant streetscape improvements on all four sides of the square. (See pages AL01-09.) These improvements will vastly enhance existing conditions and include multiple measures that address pedestrian access, circulation, and safety.

1. Pedestrian and Vehicular Access

For months prior to filing, the University worked closely with representatives of OP and DDOT to review the site plan for the project and ensure that it would provide significant enhancements to pedestrian mobility and safety around the project. This process included a comprehensive review of all potential vehicular access locations and pedestrian entrances to ensure that vehicular traffic accessing the site would not adversely impact pedestrian movement. Once the location for the vehicular entrances were confirmed, the University, OP, and DDOT continued to work together to determine what additional measures were needed to mitigate potential pedestrian-vehicular conflicts, particularly at the proposed loading and service entrance off I Street NW.

As a result, the PUD application that was filed in November 2010 represented the fruits of a collaborative planning effort to ensure that the SEC would significantly improve pedestrian mobility and safety on all four blocks surrounding the project. These enhancements include:

- The elimination of five curb cuts, including all curb cuts on the key north-south streets through the campus that feature important entrances to the SEC.
- Location of the parking garage entrance on H Street, away from pedestrian entrances to the building.

- Consolidation of SEC and residence hall loading activity into a single service area located interior to the block that permits virtually all delivery trucks to enter the site front-in and leave the site front-out.¹
- Pedestrian-oriented design features at the I Street loading entrance intended to minimize potential pedestrian-vehicular conflicts, which include the creation of a pocket park² that will reduce the amount of paved area and convert the vehicular entrance into more of a traditional alley access point, special paving and signage at the sidewalk that will emphasize the primacy of the pedestrian right-of-way, and automatic gates that will slow truck traffic leaving the area.

The PUD also includes a comprehensive truck management plan that provides operational measures to further minimize pedestrian-vehicular conflicts, including prohibitions on deliveries during the AM and PM peak commuter times, an on-site dock manager responsible for managing and coordinating all deliveries, and designated truck routes.

2. *Streetscape Design*

The design of the streetscape surrounding the proposed PUD site represents years of planning and design effort that started with the campuswide streetscape effort and continued with the development of site-specific features as a part of this PUD. While the final design of many of these streetscape elements in the public right-of-way is ultimately subject to DDOT's final approval, the University takes seriously its commitment to improve streetscapes within the Foggy Bottom campus as a key amenity of the 2007 Campus Plan / PUD and therefore has provided some additional detail on the planning and design of these public features.

In August 2010 the University finalized its Foggy Bottom Streetscape Plan, attached as Exhibit C, which sets forth the overall design strategy for the campus and details the specific features for furnishings, paving materials, lights, trees and tree boxes, and so on that will be used to further this strategy. Of particular note:

- The Streetscape Plan calls for the use of scored concrete on north-south sidewalks but for brick paving on east-west streets to better define the campus. Pg. 27. Note that the Streetscape Plan calls for these brick pavers to be laid on concrete slab specifically to minimize inconsistencies in the walking surface.³

¹ As described in earlier documents, the only trucks that will need to back in are the 55-foot trucks that will only arrive once every three months, and these deliveries will be prescheduled for weekends to minimize adverse impacts on surrounding streets.

² The John Wilson commemorative park that is currently located along 22nd Street will be relocated to this area as a part of the PUD.

³ The use of brick-on-concrete follows the standard that DDOT applies for brick sidewalks in high-traffic commercial areas. See DDOT Design and Engineering Manual Chapter 31, Section 31.6.1. While DDOT permits

- The Streetscape Plan calls for all sidewalks along new construction to be at least 10 feet wide (including the furnishing zone/tree pits and clear walkway). Pg. 40. This meets or exceeds DDOT requirements, which require a minimum width of 8 feet of width for high density residential and 10 feet of width for commercial areas outside of downtown.⁴
- The Streetscape Plan anticipates that the clear walkway for unencumbered pedestrian passage will be a minimum of 5 feet, which corresponds with DDOT's general guidelines. Pg. 42.

The design team for the SEC used these agreed-upon guidelines as a starting point for the streetscape design for the project.

As a result, the SEC uses concrete paving for the sidewalks along 22nd and 23rd Street, and brick paving for the sidewalks along H and I Streets. The SEC will also significantly increase sidewalk width around the perimeter of the site.

- The proposed sidewalks range from approximately 11 to 17 feet wide (including the furnishing zone/tree pits and clear walkway). This improves existing conditions, which provide sidewalk areas ranging between approximately 8 to 11 feet in width (including the furnishing zone/tree pits and clear walkway).
- The "clear" pedestrian walkways, in particular, all exceed the DDOT 5-foot minimum, and range from approximately 6 feet in width on H Street and 23rd Street to 7 feet on I Street⁵ and 8 feet on 22nd Street. This represents a significant improvement over existing clear widths, which are as narrow as 4-5 feet along 23rd Street and portions of I Street.

As a result, the streetscape improvements related to the SEC will represent a significant improvement over existing conditions, exceed the standards of DDOT and the Streetscape Plan, and ensure ample room for safe pedestrian movement around the site.

The streetscape design for the Project was reviewed in detail with DDOT at a Preliminary Design Review Meeting held in early January 2011.⁶ At the meeting, the overall design was generally well-received, and DDOT representatives indicated satisfaction with the proposed sidewalk and "clear" zone widths. The University will continue to work with DDOT through the

the use of brick-on-sand in residential areas, a concrete base has been selected specifically to address concerns raised by some community residents about the need for a more stable base in areas of high pedestrian activity.

⁴ See DDOT Design and Engineering Manual, Chapter 31, Section 31.2.1.

⁵ On some locations along I Street, existing improvements associated with JBKO and Munson will limit the sidewalk width to 6'3".

⁶ Public officials participating in the process included DDOT representatives responsible for pedestrian safety, ADA compliance, public space management, urban forestry, and infrastructure and project management, as well as planning and policy.

public space permitting process to address any concerns about the streetscape design as it continues to be refined.

For the reasons set forth above, the proposed streetscape design represents the outcome of a comprehensively-planned effort that will contribute to a vastly-improved pedestrian experience on all four sides of Square 55.

3. Transportation Management Plan

Extensive details on the University's campuswide Transportation Management Plan were provided in Exhibit M of the original Second-Stage PUD application, and additional details on the proposed TDM measures for this project were provided on page 28 of the Traffic Study included as Exhibit H of the original Second-Stage PUD application. The TDM measures for this project included three carsharing spaces and six electric car spaces within the proposed garage and a total of 110 bicycle parking spaces (including 30 within the garage and 80 at the ground level). The Project also offers shower facilities for occupants of the building. The TDM also includes an extensive truck management plan that is summarized above.

4. Stop Light at 22nd and I Streets

As a condition of approval of the Square 54 PUD immediately to the north, the University and its development partner, Boston Properties, agreed to fund the engineering and construction costs of a new traffic signal. As required by Condition 14(b) of Order No. 06-27, the contribution for this signal was completed in July of 2009. See Donation Agreement attached as Exhibit D.

5. Interim Parking at the Kennedy Center

Additional information regarding the interim parking at the Kennedy Center and plans for associated shuttle service are provided in Section II above.

D. Building K

As a part of the 2007 Campus Plan /PUD process, the University worked with HPO and a team of architectural historians that developed a comprehensive preservation plan for the campus based on a campuswide assessment of existing buildings. Building K was not selected for preservation based on significant prior alterations to the building; instead, it was identified as a part of the development site for Square 55. To recognize the interest of some members of the community in the prior uses of the property, the University will agree to install a commemorative plaque recognizing the former use of the building as a church, as a part of this project.

To facilitate the construction of this Project, the University will temporarily relocate the uses within Building K to existing GW leased space in the Golden Triangle/K Street corridor, or

in some cases, existing on-campus locations. Once the Square 39 School of Public Health is completed, the uses will then be given a new home within that building.

E. Construction Management Plan

As GW has done with all projects, it will work with its contractors to develop a construction plan for the site and share the information with the ANC and other interested stakeholders. The plan will address impacts on pedestrian and vehicular circulation and construction hours as well as provide a point of contact for all construction-related questions or concerns. The University will coordinate the construction management of this project with other projects as well, and will continue to use its neighborhood website to provide construction updates to the community.⁷

F. Net Effect of Development on Campus Caps

The ANC's final issue concerns the manner in which the additional density associated with projects such as the SEC impact the numbers of students, faculty, and staff on the campus and the related caps on those populations. In short, the new space is being constructed as modernized and improved replacement space for existing facilities, which is largely independent of any campuswide population growth because of the University's adherence and management to those caps.

As the University discussed during the 2007 Campus Plan / PUD proceedings, the additional space associated with the plan is largely to provide new facilities that address evolving technological and academic program needs and enhance the quality of GW's educational programs. See Order No. 06-11/06-12, Finding of Fact 30. Much of this new and improved space will effectively serve as decompression space that replaces existing constrained and outdated facilities.

In contrast, growth in campus population is largely constrained by the existing caps on students, faculty, staff that were carried over as a part of the Campus Plan / PUD. As demonstrated in its most recent compliance reports, the University is managing its student population within the headcount and FTE limits, and these caps preclude any significant overall increase in the number of students above current levels. While the University has room within its faculty and staff cap for additional growth, the employee cap set in the Campus Plan effectively protects the surrounding neighborhood from any adverse impacts over the next twenty years. In both cases, the Commission found that the maximum numbers of students and faculty/staff as expressed in the caps would not impose adverse or objectionable impacts.

As a result, even with the increased density, the University will generally continue to serve a relatively stable campus population. In the immediate future, the SEC population will consist of students, faculty and staff relocated from various facilities scattered throughout the

⁷ <http://neighborhood.gwu.edu/>

campus—in other words, existing populations already counted under the current caps. To the extent that the SEC can accommodate additional students over time as the science and engineering disciplines grow (due in part to the improved facilities), such additional growth will be managed within the existing caps. If such growth occurs, GW will manage overall enrollment by either reducing enrollment in other academic programs, or re-locating other academic programs to Virginia, Maryland or other DC locations outside of the Foggy Bottom/West End neighborhoods, to ensure that the University remains in compliance with the overall cap. As stated above, any potential increases in faculty and staff can be accommodated within the existing cap.

IV. WECA Concerns

In its party status application, the West End Citizens Association raises vehicular and pedestrian impacts as an area of concern. Many of WECA's concerns regarding pedestrian circulation, the Streetscape Plan, and the relocation of the John Wilson plaque are addressed above. Regarding traffic concerns, it is important to remember that, as a part of the extensive deliberations regarding the Campus Plan / PUD, the Commission has already resolved questions regarding traffic impacts. The hearing process featured extensive testimony and written reports from the University's traffic expert and representatives of the parties (including a traffic expert proffered by the Foggy Bottom Association) as well as three reports and related testimony from DDOT that affirmed the conclusions of the University's traffic expert and addressed, with particularity, the concerns raised by the opposition. Importantly, DDOT found that with mitigation, all of the intersections but one could be fully mitigated to levels of service that are consistent with future background conditions.

After reviewing all of the evidence in detail, the Commission found that the Campus Plan would not impose objectionable impacts due to traffic and that the impacts associated with the first stage PUD were not unacceptable given mitigation measures, amenities and benefits of the PUD. In its findings, the Commission specifically noted that while some of the existing area intersections were already at failing levels of service, the majority of the intersections would continue to be acceptable with the measures proposed by the University. See Order No. 06-11/06-12, Findings of Fact 39-40.

In addition, as a part of this Project, a detailed traffic study was conducted by Wells & Associates. This study concluded that the proposed redevelopment would not have a significant impact on traffic operations in the study area around the Project. It further found that, due to the removal of the existing parking garage, the proposed redevelopment would generate 75% fewer trips during the AM and PM peak hour than the existing garage and therefore reduce trips at all surrounding study intersections except the intersection of 22nd and I Streets. With regarding to the 22nd Street/I Street intersection, the study found that the installation of the traffic signal discussed above will accommodate traffic from this Project. (As detailed above, Boston Properties has already made the required contribution towards this traffic light.)

V. Updated Witness List and Expert Witnesses

At the hearing, the University will call four witnesses to testify on its behalf: two representatives of the University, the project architect, and its traffic consultant. The University anticipates at this time that its presentation will require up to 60 minutes.

The project architect and traffic consultant will be proffered as experts in their respective fields, and their resumes are included in Exhibit E. In addition, the University also anticipates that it will proffer its landscape architect as an expert in his field if such testimony is needed to respond to questions from the Commission. Accordingly, his resumes is also included in Exhibit E.

VI. Conclusion

The University looks forward to presenting this application at the March 24, 2011 public hearing. If you have any questions regarding this application, please feel free to contact Maureen at 202-721-1101 or David at 202-721-1137.

Sincerely,



Maureen Dwyer



David Avitabile

DA/da
Enclosures

cc: Charles Barber
Alicia O'Neil Knight

CERTIFICATE OF SERVICE

On March 4, 2011, I caused a copy of the foregoing letter and enclosure to be delivered by hand or by U.S. Mail to the following:

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