June 18, 2007

By Hand Delivery
Ms. Sharon Schellin
Secretary, D.C. Zoning Commission
441 4th Street, Room 210
Washington, DC 20001

Re: Z.C. Case No. 07-12
The George Washington University—Mount Vernon Campus
Special Exception Application for Amendment to and Further
Processing of an Approved Campus Plan
Pelham Replacement Project

Dear Ms. Schellin:

Attached is the Applicant’s Pre-Hearing Submission in support of the above-
mentioned Application for an Amendment to and Further Processing of an Approved
Campus Plan for the Mount Vernon Campus of The George Washington University.
This Application proposes the replacement of the existing Pelham Hall with the Pelham
Replacement Project, as outlined in the attached submission.

This submission, in conjunction with the materials submitted with the application
on April 6, 2007, meet the requirements for approval under Section 210 of the District of
Columbia Zoning Regulations. We look forward to presenting this case to the Zoning

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely yours,

Maureen Dwyer
David Avitabile
Enclosure

cc: Charles Barber/Alicia O'Neil
    Travis Parker, Office of Planning
    Jeff Jennings, District Department of Transportation
    ANC 3D
THE GEORGE WASHINGTON UNIVERSITY
MOUNT VERNON CAMPUS

CAMPUS PLAN AMENDMENT AND
FURTHER PROCESSING APPLICATION:
PRE-HEARING SUBMISSION

PELHAM REPLACEMENT PROJECT

FILED WITH THE ZONING COMMISSION OF THE DISTRICT OF COLUMBIA
JUNE 18, 2007
# TABLE OF CONTENTS

EXECUTIVE SUMMARY .............................................................................................................................. 1

I. NATURE OF RELIEF SOUGHT: SPECIAL EXCEPTION APPROVAL .......................................................... 4
   A. Campus Plan Amendment .................................................................................................................... 4
   B. Further Processing Application ...................................................................................................... 4
      1. Program Summary ....................................................................................................................... 4
      2. Functional, Sensitive, and Appropriate Design ...................................................................... 5
      3. Access, Loading, and Traffic ..................................................................................................... 6

II. COMPLIANCE WITH THE REQUIREMENTS OF SECTION 210 ......................................................... 6
   A. College or University Which is an Academic Institution of Higher Learning .............................. 6
   B. The Use is Located so that it is Not Likely to Become Objectionable to Neighboring Property .......................................................... 6
      1. Noise ......................................................................................................................................... 7
      2. Traffic ......................................................................................................................................... 7
      3. Number of Students or Other Objectionable Conditions (Stormwater Management) .............. 8
   C. Compliance with the Maximum Bulk Requirements ......................................................................... 8
   D. Submission of a Plan for Developing the Campus as a Whole .................................................... 9
   E. No Interim Use of Land is Proposed ............................................................................................ 9
   F. No New Use Sought for Approved Site of Buildings Moved Off Campus ..................................... 9
   G. Compliance with the Policies of the District Elements of the Comprehensive Plan .................. 9
   H. The Proposed Buildings Are Within the Floor Area Limit for the Campus as a Whole .............. 9
   I. Referral to the District of Columbia Office of Planning and District of Columbia Department of Public Works .................................................................................................................. 9

III. CONCLUSION ...................................................................................................................................... 10
# EXHIBITS

<table>
<thead>
<tr>
<th>Description</th>
<th>Exhibit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plans, Elevations, and Drawings—Pelham Replacement Project</td>
<td>A</td>
</tr>
<tr>
<td>Photographs of Existing Conditions</td>
<td>B</td>
</tr>
<tr>
<td>Plans—Access Road</td>
<td>C</td>
</tr>
<tr>
<td>Record of Meetings with Community Members</td>
<td>D</td>
</tr>
<tr>
<td>Berkeley Terrace Neighbors Agreement</td>
<td>E</td>
</tr>
<tr>
<td>W Street Neighbors Proposed Agreement</td>
<td>F</td>
</tr>
<tr>
<td>St. Patrick’s School Agreement</td>
<td>G</td>
</tr>
<tr>
<td>Remaining Gross Floor Area Available Under the Campus Plan</td>
<td>H</td>
</tr>
<tr>
<td>Final Traffic Impact Study</td>
<td>I</td>
</tr>
<tr>
<td>Traffic Control Plan</td>
<td>J</td>
</tr>
<tr>
<td>Stormwater Management Plan</td>
<td>K</td>
</tr>
<tr>
<td>Outlines of Witness Testimony</td>
<td>L</td>
</tr>
</tbody>
</table>
EXECUTIVE SUMMARY

The George Washington University’s Mount Vernon Campus integrates the resources of a major urban research university with the unique experience and focus of a more traditional, residentially-oriented campus. While there is communication and programmatic interaction between the University’s Foggy Bottom Campus and the Mount Vernon Campus, each maintains its own separate identity – both as a result of unique academic and extracurricular programs as well as the physical environment and surrounding neighborhoods that distinguish the two campuses. Accordingly, each campus is governed by its own Campus Plan. The George Washington University submitted its proposed Mount Vernon Campus Plan for the period 2000 through 2010 (the “Campus Plan”) to the D.C. Board of Zoning Adjustment (“BZA”) in 1999.¹ The BZA approved the Campus Plan on December 15, 1999 pursuant to BZA Order No. 16505.

Two further processing applications were approved concurrently with the Mount Vernon Campus Plan: an addition to Somers Hall to provide additional student residential space and an athletic facilities project that included the construction of a softball field and an elevated tennis court structure which provides underground storage, athletic support space, and parking for 175 vehicles. No other further processing applications have been filed since that time.

The Pelham Replacement Project

The existing Pelham Hall is located on the southwest quadrant of the Mount Vernon Campus (Exhibit A, Site Plan) and currently provides housing for 78 undergraduate students and includes two staff apartments. The approved Mount Vernon Campus Plan identifies Pelham Hall as a site for redevelopment and contemplates that the replacement building will contain 70,000 square feet of gross floor area and include new residential space, a potential executive training facility, and an underground parking garage accommodating 100 vehicles.

In developing a plan for the replacement of Pelham Hall, the University evaluated its current space requirements and institutional priorities in light of its ongoing effort to foster and enhance the living and learning experience at the Mount Vernon Campus. Consistent with the existing Campus Plan, the University seeks to achieve an appropriate balance of academic and student housing resources and maintain a well-balanced campus in the context of its surrounding residential environment. The redevelopment of the Pelham site set forth in this application supports these planning objectives.

The plans detailed herein call for the demolition of the existing Pelham Hall and the construction of a new residence hall (the “Pelham Replacement Project” or the “Project”). The Pelham Replacement Project will provide approximately 287 beds for undergraduate student housing as well as three apartments for professional staff in a design that is in keeping with the architecture, character and materials of the existing campus environment. The Project will provide below-grade residential/campus life and building support space as well as a dining facility which will enable the University to transition the use of space currently accommodating student support functions in and around the central campus quadrangle to academic purposes, consistent with the tradition of the campus and the planning objectives set forth in the Campus Plan. The Project does not, however,

¹ Effective December 8, 2000, responsibility for the review and approval of campus plans and further processing applications was transferred to the D.C. Zoning Commission (“Commission”).
include the executive training facility\(^2\) or underground parking contemplated in the Campus Plan.

In order to address the University’s planning priorities and further develop the living and learning environment at the Mount Vernon Campus in an efficient manner, the gross floor area of the proposed Pelham Replacement Project exceeds the guideline set forth in the Campus Plan for the redevelopment of the Pelham site by approximately 22,761 square feet. While an amendment to the Campus Plan is necessary to accommodate the additional gross floor area required for this Project, the amendment represents only a reallocation of gross floor area approved in the Campus Plan. No other changes to the existing Campus Plan are proposed by this application.

**Building a Consensus Plan**

Early in the planning process, the University initiated discussions regarding the redevelopment of Pelham Hall with members of the community, primarily through the forum of the Mount Vernon Campus quarterly community meetings that were established as a condition of the Campus Plan. Over the past several months, GW has engaged interested residents, particularly those who would be most directly impacted by the Pelham Replacement Project, in more focused conversations regarding the University’s goals and needs with respect to the Project as well as the community’s concerns and issues associated with the new building. A record of meetings with community members regarding the Pelham Replacement Project is attached as Exhibit D.

After months of constructive dialogue, the University and residents of Berkeley Terrace (the “Berkeley Terrace Neighbors”) came to agreement on various issues associated with the Project. The specific terms of this consensus have been memorialized in a letter agreement dated April 6, 2007 and attached as Exhibit E. The Applicant and the Berkeley Terrace Neighbors request that the terms of this agreement be made conditions to the approval of this application. The University is currently engaged in a similar dialogue with other community members who generally reside north of the campus, along W Street and adjacent roads (the “W Street Neighbors”). The most recent version of the University’s proposed agreement with the W Street Neighbors is attached as Exhibit F.

The University has also discussed the plans for the Pelham Replacement Project with its institutional neighbor St. Patrick’s School, and on June 14, 2007, the two institutions executed a letter agreement, which is attached as Exhibit G. First, the two institutions have come to an understanding regarding construction management issues related to the construction of the Pelham Replacement Project and related access road, which will be included in a Construction Management Plan that will be prepared prior to the commencement of construction. Second, St. Patrick’s School and the University have detailed specific terms regarding post-construction traffic and operations issues associated with the Pelham Replacement Project and related access road (Exhibit B of the Saint Patrick’s Agreement), and both institutions respectfully request that these terms be made conditions to the approval of this application.

\(^2\) Although the University is not constructing the executive training facility contemplated under the 2000 Campus Plan for the Pelham site, the University will continue to maintain the Mount Vernon Campus’ wide-range of academic programs, including both continuing education courses and conferences, uses provided for under the 2000 Campus Plan.
The Pelham Replacement Project represents the results of the productive conversations between the University and these various interested stakeholders, as well as input from the Office of Planning and ANC 3D. The constructive dialogue between the University and its neighbors which led to the development of this application – including the quarterly community meetings established under the Campus Plan as well as the more recent focused discussions regarding the Pelham Replacement Project – will continue to play an important function in the coming years and provide a forum for ongoing discussion of key University planning efforts, including the development of the next Mount Vernon Campus Plan.
I. NATURE OF RELIEF SOUGHT: SPECIAL EXCEPTION APPROVAL

Pursuant to 11 DCMR Section 3104 and in accordance with Section 210 of the Zoning Regulations, The George Washington University requests special exception approval for an amendment to and further processing of an approved Campus Plan to permit the replacement of the existing Pelham Hall with the proposed Pelham Replacement Project. No variances are requested in this application, and the requested special exception relief fully meets the requirements of the Zoning Regulations.

A. CAMPUS PLAN AMENDMENT

The Campus Plan contemplated that the redevelopment of Pelham hall would include 70,000 square feet of gross floor area, accommodating new residential space, a potential executive training facility, and an underground parking facility for 100 vehicles. Based on an evaluation of the University’s current space needs and after several months of discussions with various stakeholders both within and outside the University, the programming of the Pelham Replacement Project was modified to reflect current space requirements and institutional planning priorities and address concerns from members of the community regarding impacts related to the Project. As a result, the Project as submitted includes student residential space and residential/campus life and building support space (including a new dining facility), but does not include an executive training facility or any underground parking.

The gross floor area of the proposed Pelham Replacement Project exceeds the guideline set forth in the Campus Plan for the redevelopment of the Pelham site by approximately 22,761 square feet. A minor amendment to the Campus Plan is necessary to accommodate this additional gross floor area for the Project, however the amendment represents only a reallocation of approved gross floor area. Specifically, the amendment will not result in any additional gross floor area beyond which has been already approved for the “residential/campus life/athletic” land use category and for the Mount Vernon Campus as a whole as set forth in Appendix F of the Campus Plan. (For further detail, please see the attached Exhibit H, which shows the space remaining under the Campus Plan.) Furthermore, the amendment does not seek to modify the land use designation of the Pelham Replacement Project.

B. FURTHER PROCESSING

1. Program Summary

The Pelham Replacement Project includes approximately 92,761 square feet of gross floor area, and will result in approximately 65,100 net new square feet of gross floor area on the Mount Vernon Campus. The Project will provide approximately 287 beds for undergraduate student housing (and three apartments for professional staff), which translates to an additional (net) 209 and an overall 689 student beds on the Mount Vernon Campus. This increase is consistent with the resident student population estimates set forth in the Campus Plan (See Campus Plan, Appendix A) as well as with the University’s broader institutional priority to house increased numbers of its undergraduate student population on-campus. Providing additional student housing is also a key

3 Occupancy data of current parking facilities from the University Parking Office indicates that the current parking supply is more than adequate to satisfy the existing and proposed parking demand.
policy goal of the recently approved 2006 District of Columbia Comprehensive Plan as well as the prior Comprehensive Plan.

Approval of this Project will also provide the opportunity for a new dining facility at the Mount Vernon Campus as well as additional below-grade residential/campus life support space that could accommodate activities such as student meeting rooms, practice areas, and student performance space. Incorporating these functions in the Project will enhance the unique living and learning community that has been fostered on the Mount Vernon Campus, and will enable the University to transition the use of space currently accommodating student support functions in and around the central campus quadrangle to academic purposes, consistent with the tradition of the campus and the planning objectives set forth in the Campus Plan.

2. Functional, Sensitive, and Appropriate Design

The Pelham Replacement Project has been scaled and sited to provide a functional and architecturally-appropriate building that respects and minimizes impacts on the surrounding residential community. The University has worked closely with a variety of stakeholders, including residents who are most directly affected by the Project, to develop planning and design strategies that are sensitive to surrounding uses and reduce the building’s physical impact. For example, the building footprint has been shifted to the south and east (away from Berkeley Terrace) to the extent possible while still respecting the setback and “protected areas” outlined in the Campus Plan. This allows the new building to take advantage of existing natural contours and grade changes to limit its visual impact on Berkeley Terrace residences. Furthermore, in direct response to the Berkeley Terrace Neighbors, the Project calls for the addition of a dense landscaping barrier, including coniferous and other year-round screening elements (Exhibit A, Landscape Plan).

Impacts associated with the Project’s use and activity patterns have also been carefully considered and addressed through the design and functional organization of the Project. First, the building is set back at least 125 feet from the property line along Berkeley Terrace, and is situated in the area shown in Exhibit B of the Mount Vernon Campus Plan, as required by Condition 8(d) of the Mount Vernon Campus Plan Order (the “MV Order”). In addition, the building includes a 68-foot deep courtyard entry that is oriented toward the center of campus, significantly reducing student activity on the west side of the building that faces Berkeley Terrace. Additionally, the University revised its design to lower the roofline on the north wing of the building by one floor in direct response to concerns that light and noise emanating from windows on the west (Berkeley Terrace facing) side of the north wing of the building might have an adverse impact on residential neighbors.

The design of the building draws from the palette of existing materials prevalent throughout the campus, and features the use of brick and a hip roof with a slate-like appearance. The height of the building is fully consistent with the Campus Plan, as the roofline of the Project does not exceed the height of the existing Pelham Hall, as required by Condition 8(f) of the MV Order. Moreover, the building will incorporate a number of sustainable design features, including stormwater quantity and quality control; enhanced commissioning of the building’s energy systems; the use of reused, recycled, and regional materials; and the use of a variety of low-emitting materials to improve indoor environmental quality. The University is seeking to achieve the equivalent of a minimum of 16 LEED-NC v.2.2 points in the construction of the Project.

A map of the Mount Vernon Campus, Project plans, elevations, and a context study of the campus
are attached as Exhibit A. Photographs of existing conditions are attached as Exhibit B.

3. Access, Loading and Traffic

The loading and service facility for the Pelham Replacement Project will be accessed by an additional campus access road located on Whitehaven Parkway (called for in the existing 2000 Campus Plan) (the “Access Road”), which limits the need for vehicles to use the existing perimeter road to reach the building. Plans depicting the location and operation of the Access Road are attached as Exhibit C. The Access Road will provide substantial benefits both during the construction of the Project and following its completion. Upon completion of the access road, the University has agreed, in response to the specific request of the Berkeley Terrace Neighbors, to restrict the use of the perimeter road to one-way, university-related traffic and to remove five surface parking spaces along the perimeter road which are adjacent to the residents’ backyards. The utilization of this additional access point on Whitehaven Parkway, an institutional street, further addresses the concern of neighbors voiced during the approval process for the Campus Plan that regular campus-related traffic be directed away from the W Street entrance. Finally, as detailed above, the University has come to agreement with St. Patrick’s School regarding construction and traffic management concerns along Whitehaven Parkway in connection with the Pelham Replacement Project and related Access Road.

As detailed more fully below (Section II.B.2.), the additional resident students and activity associated with the Project will not result in any appreciable increase in traffic.

II. COMPLIANCE WITH THE REQUIREMENTS OF SECTION 210

In all respects, the requested special exception fully complies with Section 210 of the Zoning Regulations. The specific zoning requirements are addressed in detail below.

A. College or University Which is an Academic Institution of Higher Learning (Subsection 210.1)

By Act of Congress dated February 9, 1821, The George Washington University was chartered as an educational institution of higher learning. The University’s use of the property qualifies as a college or university use in accordance with Section 210 of the Zoning Regulations.

B. The Use is Located so that it is Not Likely to Become Objectionable to Neighboring Property (Subsection 210.2)

Since 1946, when the Mount Vernon College was moved to its Foxhall Road location, the campus has coexisted with the surrounding neighborhood with minimum impact on the community. The proposed amendment to the Campus Plan and further processing application continues that tradition and provides a carefully designed Project that minimizes any objectionable impacts to the surrounding neighborhood. The proposed development results in the addition of only 0.067 Floor Area Ratio (FAR) to the campus, and the Project will not result in an increase in the overall development or student population limits approved under the Campus Plan.
1. Noise

There have been no complaints about noise arising from activity associated with the existing Pelham Hall dormitory. Further, the Pelham Replacement Project has been shifted to the south and east (away from Berkeley Terrace) to the extent possible, while still respecting the setback and “protected areas” outlined in the Campus Plan. The building’s main entrance and courtyard are located on its east side facing the center of campus and its loading facility is located in its southeast corner, away from the surrounding residential community and oriented toward Whitehaven Parkway, an institutional street. Existing contours and vegetation to the north and west provide a natural barrier for noise and visual impacts, and the University has proposed the addition of dense landscaping to enhance this natural screening barrier, further minimizing the impact of noise on the surrounding neighborhood.

2. Traffic

As detailed in the Traffic Impact Study dated May 23, 2007 and attached as Exhibit I, the Campus Plan amendment and further processing application will not result in objectionable traffic and parking impacts. The requested Campus Plan amendment results in the reallocation of development among identified sites on campus and results in no additional gross floor area for the campus beyond that which is approved under the existing Campus Plan, nor additional students beyond the number authorized by the Plan. The University will continue to maintain above-adequate parking on campus and enforce parking policies that are intended to minimize neighborhood impacts. Further, the University will continue to maintain the successful Vern Express (shuttle bus) service between the Foggy Bottom and Mount Vernon campuses, which substantially reduces the need for students, faculty, and staff to use personal vehicles to travel between the campuses. The shuttle bus system contains adequate capacity to absorb the additional (net) 209 resident students, and GW does not currently anticipate the need to add additional shuttles to the system.

The Pelham Replacement Project specifically calls for a number of measures to minimize traffic and parking impacts. The Project’s service and loading dock is located on the southeast side of the building and will be accessed from an additional campus access road off Whitehaven Parkway (identified in the Campus Plan). Again, the University has worked with institutional neighbor St. Patrick’s School to coordinate operational issues related to the existing and additional campus access points on Whitehaven Parkway, both during and following Project construction. Furthermore, the University will work with its residential and institutional neighbors prior to the commencement of construction to develop a construction management plan for the construction of both the Access Road and the Pelham Replacement Project. To this end, the University has committed to a set of guidelines that will govern traffic management, and this Traffic Control Plan is attached as Exhibit J.

The utilization of the new Access Road, with a direct connection to Whitehaven, also allows the University to restrict the use of the existing road along the northwest perimeter of the campus to one-way (west- and south-bound) traffic for University vehicles and limited pick-up or drop-off for disabled students who reside in the Pelham Replacement Project. In
addition, the University has agreed to remove five parking spaces along the perimeter road closest to the Berkeley Terrace neighbors.\textsuperscript{4}

3. Number of Students or Other Objectionable Conditions (Stormwater Management)

Approval of the special exception will not create objectionable conditions because of the number of students or other conditions. This application does not propose any change in the existing student or faculty and staff population caps, nor does it propose an increase in the overall gross floor area approved under the existing Campus Plan.

Members of the community have inquired into the impacts of the proposed Project on stormwater management. Over the course of the existing Campus Plan, the University has implemented a comprehensive stormwater management system for the Mount Vernon campus. Prior to 2000, the campus’ stormwater management system relied primarily on the free flow of water over the campus and secondarily on connections to the city’s stormwater system through the use of pipes carrying water to the west of the campus. By 2002, in connection with the athletic facilities project referenced on page 1, the University had installed an underdrain system on the bulk of the campus that provided immediate connections to the adjacent city sewer systems on W Street and Whitehaven Parkway. In particular, the University worked with the D.C. Water and Sewer Authority (“WASA”) to develop a solution for stormwater management in the northwest corner of the campus that continues to effectively manage the impacts caused by stormwater leaving the Mount Vernon campus at that location.

At the Pelham site on the southwestern portion of the campus, the University has to date constructed limited improvements that address natural watershed runoff. The improvements associated with the Pelham Replacement Project include additional features that fully address this portion of the Mount Vernon campus and complete the University’s implementation of its comprehensive stormwater management plan. The Project’s proposed Stormwater Management Plan, which is attached as Exhibit K, includes a series of improvements that provide stormwater quality and quantity control. Specifically, the system will use surface treatments, landscaping, collector points and trench drains to reduce the volume of runoff and route stormwater into an underdrain system that connects to the existing city sewer system on Whitehaven Parkway. The system also features an underground sandfilter that will provide stormwater quality control. The proposed stormwater management improvements associated with the Pelham Replacement Project, in conjunction with earlier improvements, will manage all natural watershed and site-generated runoff at the Project site, and as a result the Project will not create any objectionable impacts due to stormwater runoff.

C. Compliance with the Maximum Bulk Requirements (Subsection 210.3)

The Mount Vernon Campus Plan: 2000 – 2010 approved an overall campus FAR of 0.49, which is well below the maximum 1.8 FAR permitted under the Zoning Regulations based on the underlying

\textsuperscript{4} These measures respond to specific requests from the Berkeley Terrace Neighbors and are detailed further in the letter agreement attached as Exhibit E. The University would retain the right to use the perimeter road for two-way traffic and non-University vehicles during limited special events and activities, such as student move-in and move-out.
zoning of the campus. The proposed Campus Plan amendment and further processing application does not result in an increase to the approved campus FAR limit. Indeed, even after construction of the Pelham Replacement Project, the campus density will remain well below its approved maximum of 0.49 FAR.

D. Submission of a Plan for Developing the Campus as a Whole (Subsection 210.4)

As noted above, the University’s Campus Plan was approved by the Zoning Commission on December 15, 1999. Pursuant to Section 1 of the Campus Plan Order, the approval is valid until December 31, 2010. This proposed amendment to the Campus Plan results in no additional gross floor area beyond that which has already been approved but rather provides for a reallocation of gross floor area among development sites identified in the Plan.

E. No Interim Use of Land is Proposed (Subsection 210.5)

No interim use of land is requested as part of this Application.

F. No New Use Sought for Approved Site of Buildings Moved Off Campus (Subsection 210.6)

The University does not seek approval for any use of a previously approved building site and thus complies with this section.

G. Compliance with the Policies of the District Elements of the Comprehensive Plan (Subsection 210.7)

The Project is not inconsistent with the policies of the District Elements of the Comprehensive Plan. The Project will further the goals and objectives of the Ward 3 Element of the Comprehensive Plan by enhancing educational facilities in the Ward without adversely impacting adjacent residential areas. The Project also furthers the goals and objectives of the Comprehensive Plan that call for the provision of on-campus student housing.

H. The Proposed Buildings Are within the Floor Area Limit for the Campus as a Whole (Subsection 210.8)

The approved Campus Plan FAR of 0.49 is within the maximum 1.8 FAR permitted for the campus based on its underlying zoning. As noted above, the development proposed under this application will have a minor effect on the overall FAR for the campus (an increase of 0.067 FAR).

I. Referral to the District of Columbia Office of Planning and the District of Columbia Department of Public Works (Subsection 210.9)

It is the Applicant’s understanding that this application will be referred to the Office of Planning and the District Department of Transportation for their review and report. The University has already been in contact with both agencies regarding the application and will continue to consult with them throughout the review and approval process.
III. CONCLUSION

For the reasons set forth herein, this application for amendment to and further processing of an approved Campus Plan meets the special exception requirements and carries out District, community, and University objectives for the Mount Vernon Campus of The George Washington University. The Pelham Replacement Project will address key University planning priorities – including providing additional undergraduate student housing, making more efficient use of existing campus resources, and further developing the living and learning environment at the Mount Vernon Campus – while continuing to maintain a well-balanced campus in the context of its surrounding residential environment. Accordingly, it is respectfully requested that the Commission approve this Application.