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November 2, 2010

VIA HAND DELIVERY

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

Re: **Z.C. Case No. 06-11A/06-12A**
GW Foggy Bottom Campus Plan / PUD – Square 103
Pre-Hearing Statement of the University

Dear Chairman Hood and Members of the Commission:

Pursuant to 11 DCMR Section 3013.1, The George Washington University (“University”) hereby files its pre-hearing statement for the above-referenced case.

Background

The property that is the subject of this application consists of multiple lots along G Street NW between 20th Street NW and 21st Street NW (Square 103, Lots 13, 14, 18, 809, 812, 813, 814, 819, and 820) (“Property”). The Property is located in the R-5-D Zone District and consists of approximately 38,328 square feet of land area. The Property is part of the University’s 2007 Foggy Bottom Campus Plan, which was approved by the Zoning Commission in Order No. 06-11 / 06-12. In conjunction with the approval of the Campus Plan, the Commission also approved a First-Stage PUD, which identified 16 development sites on the campus for future improvements (together, “Campus Plan / PUD”). The Property was designated as a future development site.

On August 17, 2010, the University filed an application for second-stage approval of a PUD in order to permit the construction of an underground structure containing 392 parking spaces and program space for its Law School, as well as certain interim surface improvements related to the below-grade facilities, including pedestrian and vehicular entrances, and surface parking for an additional 58 parking spaces (“Project”). Pursuant to the approved Campus Plan / PUD, the University also requested further processing approval for the Project. Finally, the University requested approval of a modification to the First-Stage PUD in order to incorporate Lot 18, which was previously not owned by the University.

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The proposed Project is the first phase of development of the Property. Pursuant to the Campus Plan / PUD, a new building devoted to academic and administrative uses, with a height of 80 feet, lot occupancy of 90%, and gross floor area of 185,983 square feet, is approved for the Property. Given that the Project consists almost entirely of below-grade improvements, the University will return to the Commission for second-stage / further processing approval of above-grade improvements consistent with the first-stage approval at a later date. The timeframe for construction of the second phase of the Project is currently unknown and will be determined by future programming and funding.

Setdown Meeting and Responses to the Zoning Commission

The Zoning Commission set the application down for a public hearing at its public meeting on October 18, 2010. At the setdown meeting, the Commission raised questions and commented on (1) the First-Stage PUD modification; (2) the interim surface parking lot; (3) the proposed flexibility from the rear yard requirements; (4) the bicycle facilities for the Campus as a whole; (5) the features of the Project that address stormwater management; and (6) community comments on the application. These issues are addressed below.

1. Incorporation of Lot 18

The need to amend the Campus Plan / PUD to incorporate properties that were within the Campus Plan boundaries but not owned by the University in 2007 was anticipated by the University in the documents associated with the Campus Plan / PUD. In its First-Stage PUD pre-hearing submission, the University noted that two of the proposed Campus development sites contained properties not owned by the University, as follows:

Two of the development sites identified, specifically 79A and 103A, each include one property which is not currently owned by the University. Pursuant to the Zoning Regulations, properties not owned by the University are not included in this PUD application. Upon acquisition of these properties, the University intends to file an amendment to this PUD to include the properties in the development sites depicted in Exhibit A. First-Stage PUD Pre-Hearing Submission (July 13, 2006) at 3 n2.

These future acquisitions were also identified in the Tabulation of Development Data attached to that submission as Exhibit B.

2. The Interim Surface Parking Lot

At the setdown meeting, members of the Commission expressed several concerns regarding the proposed interim surface parking lot.

One concern focused on the degree to which the University's design and treatment of the surface lot minimize environmental impacts, including stormwater runoff. Broadly, the Project represents a marked improvement over existing conditions, which consist of a site that is 100% impervious and contains surface parking for 93 vehicles. The Project includes a series of sustainable features that improve the overall sustainability of the site and minimize the impact of the surface lot.

- The Project's interim surface parking is located on the eastern portion of the site and has been consolidated to accommodate parking for approximately 58 vehicles. Runoff from this section will flow to an area drainage system that returns stormwater to a cistern located under the parking ramp. (This cistern has been sized to anticipate the needs for the future building on the development site.) The cistern's demand load will not only include stormwater management, but is anticipated to also include grey-water recycling.
- A second cistern, located on the western side of the site will collect water from the lawn, pedestrian plaza, loading zone, and the entry pavilion's green roof. The captured rainwater will then be used to irrigate the lawn and plantings in the pedestrian plaza.

As a result, through absorption or capture and re-use, the Project is designed to be a zero-water discharge site.

The Commission also expressed concern regarding the number of parking spaces and their appearance from the street. As noted above, the Project actually results in a reduction in the number of parking spaces on the site. In addition, the Project features a generous landscape barrier that will buffer views of the parked cars through a combination hedges and trees. And the proposed loading zone at the rear of the Property will be further shielded from public view by a wood screen wall.

The proposed interim spaces are required to offset the anticipated loss of nearly 1,500 total on-campus parking spaces that will take place with the upcoming redevelopment of the site of the University Parking Garage ("UPG") on Square 55. (The second-stage application for the redevelopment of Square 55 will be filed shortly with the Commission.) This need for additional parking supply is responsible, in large part, for the University's decision to phase the development of Square 103 and bring the underground parking online prior to the construction of the building itself.

The University's plan for parking for the Foggy Bottom Campus is a carefully sequenced set of events that will allow the University to continue to meet the required minimum number of off-street parking spaces as well as continue to meet the University's parking needs. As a part of this sequencing, the University has proposed using some of the Property as surface parking. The interim 58 parking spaces will be a significant improvement over the existing conditions, which feature 93 parking spaces for vehicles that are also parked in a stacked manner. Furthermore, as discussed above, the Project will reduce the overall amount of impervious surface on the

Property to improve stormwater management, and includes extensive landscaping that will minimize the visual impact of the parking lot and enhance the streetscape and pedestrian experience. Therefore, the University believes that the Project adequately balances the need for interim parking with the desire to improve the aesthetics of the Foggy Bottom Campus.

Finally, the Commission expressed concern regarding the duration of the “interim” parking use. As discussed above, the University phased the development of the Property to create underground parking on the site in the near term in order to facilitate the campus-wide goals for demolition of the UPG and dispersal of parking. There will be a multi-storied building above ground as part of the second phase of the Project; the timeframe for construction of the second phase, however, will be determined by future programming and funding. As discussed above, the additional interim surface parking spaces are needed in order to accommodate demand while the University continues to construct additional underground parking on campus. Once the University completes the redevelopment of Square 55 (and its associated underground garage), the University intends to discontinue the use of this interim surface parking lot.

3. Rear Yard Relief and Impacts Related to the Future Building

At the setdown meeting, the Commission expressed concern that the approval of the underground elements, and the associated rear yard relief for the interim condition, would set an expectation of approval for the rear yard of the second phase of the Project that has not yet been designed. The University recognizes the Commission’s concerns regarding the approval of rear yard relief that could carry over to the second phase of the development. Here, however, while the structural columns in the first phase are engineered to support the future building, the design would not preclude a greater or lesser rear yard for the future building. Additionally, the future building could incorporate upper-story setbacks, if necessary. Note that the buildings located across the alley and immediately behind the Property (as well as all of the properties in the square save one) are all owned by the University. Therefore, the only property owner impacted by the rear yard relief will be GW.

The Commission similarly expressed concern that the dimensions established by the below-grade improvements could preclude future adjustments that the Commission might believe are necessary to respond to the design of adjacent townhouses to the east and west. The University appreciates this concern as well, and again notes that while the proposed columns have been engineered to support a future building, they do not preclude setbacks or other design solutions. Moreover, the University has voluntarily agreed to include this site in the proposed campus historic district, which will subject the future development to review by historic preservation officials and ensure its compatibility with adjacent historically significant properties.

4. Bicycle Facilities

At the setdown meeting, Commissioner May requested additional information on the proposed bicycle parking, particularly in the context of overall campus efforts regarding bicycles. The University has actively promoted bicycle use as a part of its overall campus Transportation Management Plan. To this end, the Campus currently maintains 15 public bike racks throughout its Foggy Bottom Campus as well as various secure, indoor racks in residence halls and other access-controlled University buildings. In addition, there are three bike sharing racks located on or adjacent to the Campus, including one rack located two blocks from the property at 20th and E Streets NW.

Going forward, the University is committed to enhancing its bicycle facilities, and is actively using proposed construction as an opportunity to implement these improvements. This Project will continue to encourage bike use on the Foggy Bottom Campus by providing secure bicycle storage both on the surface and in the garage for an approximate total of 60 bicycles. Other planned projects in Squares 55 and 39 will include a combination of street-level and interior bicycle parking as well, as will be detailed in those applications.

The University will provide a map of campus bicycle facilities in a supplemental submission prior to the hearing.

5. Stormwater Management

As mentioned above, the Project will replace a site that is 100% impervious with landscaped areas and permeable paving that will cover 24% of the site and effectively function as a green roof over the below-ground improvements and aid in the collection and filtration of stormwater. Other sustainable design features include stormwater management tanks under the parking ramp and an above-ground cistern as well as surface drains that will allow for greywater reuse on the Property. These sustainable features have been designed to capture and reuse all stormwater runoff and have been sized to anticipate the needs of a future building that meets the zoning specifications on the site.

6. Community Input

At the setdown meeting, Chairman Hood inquired about community interest in the Project. As OP noted in response, GW has actively engaged the community regarding the Project, through presentations to both the campus Advisory Committee and to Advisory Neighborhood Commission (ANC) 2A. The University has also received questions from the West End Citizens Association (WECA) regarding the potential traffic-related impacts of the Project. In advance of the public hearing, the University will continue to work with interested neighborhood stakeholders, including Advisory Committee, ANC 2A and WECA, to discuss and address comments and questions. If necessary, the University will incorporate responses into a supplemental filing prior to the hearing.

Witness List, Proposed Testimony, and Time Estimate for Presentation

We look forward to presenting this case to the Commission, including a full explanation and discussion regarding the proposed landscaping improvements to the Property. The University will provide three witnesses to testify on its behalf: a representative of the University, the project architect, and its traffic consultant. Outlines of the testimony of all of the University's witnesses are attached as Exhibit A.

The written report of the Applicant's traffic consultant was submitted with the initial application; any changes or supplemental information regarding the report will be included in a supplemental filing.

The University anticipates at this time that its presentation will require up to 60 minutes.

Project Plans

The University has not made any significant modifications to the plans that were submitted with the initial application. Accordingly, the University has not included a reprinting of the plans. Any minor refinements will be provided to the Commission in a supplemental pre-hearing submission.

Publicly Available Maps

Per Section 3013.1(f), the Applicant offers the following publicly available maps and documents into evidence in support of its case: the District of Columbia Zoning Regulations and Map, the District of Columbia Future Land Use Map and Generalized Land Use Map, WMATA transit maps related to this site, previous Orders of the District of Columbia Zoning Commission, and the District of Columbia Comprehensive Plan.

In addition to the foregoing, the 2007 George Washington University Foggy Bottom Campus Plan and First-Stage PUD, as well as the initial application package for this second-stage PUD, are available online at <http://neighborhood.gwu.edu>.

Property Owners' List

A list of the names and addresses of the owners of all property located within 200 feet of the Property was included in the initial application. For the Commission's convenience, the list is reprinted as Exhibit B.

Conclusion

As set forth above, the University has met the requirements of Section 3103, and accordingly requests that a public hearing be scheduled as soon as possible. If you have any

Sharon Schellin
November 2, 2010
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questions regarding this application, please feel free to contact Maureen at 202-721-1101 or David at 202-721-1137.

Sincerely,

A handwritten signature in black ink, appearing to read "Maureen Dwyer", with a stylized flourish at the end.

Maureen Dwyer

A handwritten signature in blue ink, appearing to read "David Avitabile", with a horizontal line extending from the end.

David Avitabile

DA/da
Enclosures

cc: Charles Barber
Alicia O'Neil

CERTIFICATE OF SERVICE

On November 2, 2010, I caused a copy of the foregoing letter and enclosure to be delivered by hand or by U.S. Mail to the following:

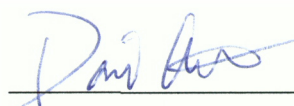
Jennifer Steingasser
Deputy Director, Development Review and
Historic Preservation
D.C. Office of Planning
1100 4th Street, SW, Suite E650
Washington, DC 20024

Jeff Jennings
Policy and Planning
District Department of Transportation
2000 14th Street, NW, 7th Floor
Washington, DC 20009

Advisory Neighborhood Commission 2A
West End Branch Library
1101 24th Street, NW
Washington, DC 20037

Foggy Bottom Association
PO Box 58087
Washington, DC 20037-8087

West End Citizens Association
c/o Barbara Kahlow
800 25th Street, NW #704
Washington, DC 20037



David Avitabile

EXHIBIT A

Outline of Witness Testimony Representative of the University

I. Introduction

II. Review of Campus Plan / PUD Goals

III. Project Goals

IV. Project Benefits and Amenities

V. Community Outreach

VI. Conclusion

Outline of Witness Testimony
Representative of Project Architect

I. Introduction

- a. Project Architects – Shalom Baranes Associates and Perkins + Will
- b. Landscape Architect – Oculus
- c. Work in the District

II. Site location and description

- a. Overview of site, surrounding area and land use
- b. Site planning and compatibility with surrounding area
- c. First Stage PUD approval

III. Project Design

- a. Parking Garage
- b. Program Space for the Law School
- c. Surface Improvements

IV. Conclusion

Outline of Witness Testimony
Representative of Traffic Consultant

I. Introduction

- a. Project Traffic Consultant – Gorove Slade Associates
- b. Work in the District

II. Traffic Impact Analysis

- a. Scope of Study
- b. Transportation network and site access
- c. Existing conditions
- d. Future conditions

III. Recommendations

IV. Transportation Management Plan

V. Conclusion

**NAME AND MAILING ADDRESS OF THE OWNERS OF ALL PROPERTY
WITHIN 200 FEET IN ALL DIRECTIONS FROM ALL BOUNDARIES OF THE
PROPERTY INVOLVED IN THE APPLICATION**

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POL-/GW Sq. 103

			Ms. Rebecca Coder, Chairperson - ANC 2A c/o West End Branch Library 1101 24th Street, NW Washington, DC 20037
			L. Asher Corson President, Foggy Bottom Association 955 26 th Street, NW, Apt. 709 Washington, DC 20037
			Jack Batham President, West End Citizens Association 2000 F Street, NW, #506 Washington, DC 20006
			Ms. Rebecca Coder Chairperson, ANC 2A 2501 M Street, NW #721 Washington, DC 20037