

FOGGY BOTTOM CAMPUS PLAN / PUD
SQUARE 102B DEVELOPMENT SITE
THE GEORGE WASHINGTON UNIVERSITY MUSEUM

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APPLICATION TO THE
DISTRICT OF COLUMBIA ZONING COMMISSION FOR
REVIEW AND APPROVAL OF A SECOND-STAGE PLANNED UNIT DEVELOPMENT
AND FURTHER PROCESSING OF AN APPROVED CAMPUS PLAN

November 2, 2011

ZONING COMMISSION
District of Columbia

CASE NO. 06-11F/06-12 F
EXHIBIT NO. 4

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PREFACE

This statement and the attached documents support the application of The George Washington University (“University” or “Applicant”) to the Zoning Commission for second-stage approval of a Planned Unit Development (“PUD”) for the property known as part of Lot 46 in Square 102 (“Subject Property”). The Subject Property is one of sixteen development sites identified in the University’s First-Stage PUD for its Foggy Bottom Campus, which was approved by the Zoning Commission in Order No. 06-11/06-12. In conjunction with this application, the University also requests further processing approval for this application under the Foggy Bottom Campus Plan, which was also approved by the Commission in Order No. 06-11/06-12.

The University intends to develop the Subject Property, which is located at the northeast corner of the intersection of 21st and G Streets, NW, as The George Washington University Museum. The Museum will be located at the corner of 21st and G Streets, in an infill building to be constructed along 21st Street as well as in the Woodhull House. As a part of the project, the University will renovate Woodhull House and relocate a stair tower associated with Corcoran Hall, which is immediately to the north of the Subject Property.

This PUD application is consistent with the District of Columbia Comprehensive Plan, D.C. LAW 16-300, 10A DCMR (Planning and Development) § 100 et seq. (2006) (the “Comprehensive Plan”), as well as numerous goals and policies of the District of Columbia. This Project will benefit the District by implementing many of the public benefits and project amenities outlined in the Campus Plan / PUD, including sustainable design elements in new construction, historic preservation, and landscape and streetscape improvements.

I. INTRODUCTION

A. *Summary of Requested Action*

This document supports the application of The George Washington University (“University” or “Applicant”) to the Zoning Commission for the District of Columbia (“Commission”) for second-stage approval of a Planned Unit Development (“PUD”) for the property known as part of Lot 46 in Square 102 (“Subject Property”). The Subject Property is one of sixteen development sites identified in the University’s approved Campus Plan and First-Stage PUD for its Foggy Bottom Campus, which were concurrently approved by the Zoning Commission in Order No. 06-11/06-12 (hereinafter, the “Campus Plan / PUD”). The University also requests further processing approval for the proposed application under its approved Campus Plan.

The Subject Property consists of approximately 13,811 s.f., or approximately 0.3 acres, of land area, and is comprised of Development Site 102B (“Site 102B”) and the Woodhull House.¹ Corcoran Hall is located to the north of the Subject Property. The University intends to develop the Subject Property as The George Washington University Museum (“GW Museum”). The GW Museum will foster the study and appreciation of art, history, and culture, both within the University and throughout the global community, through its affiliation with The Textile Museum (“TM”) and through its University collections, including the Albert H. Small Washingtoniana Collection.

¹ In the First-Stage PUD, Development Site 102B was identified as an infill area located between Woodhull and Corcoran, consisting of approximately 9,730 square feet of land area. The Subject Property also includes Woodhull House and contains 13,811 square feet of land area. As shown on Exhibit C, Lot 46 is coterminous with the boundaries of the entirety of Square 102. The Subject Property is located in the southwest corner of the lot, as marked on the plat.

The GW Museum will be located at the corner of 21st and G Streets, in an infill building to be constructed on Site 102B along 21st Street as well as in the Woodhull House (“Project”). The infill building will be connected to the Woodhull House, and it will contain four above-grade and two below-grade stories of academic and administrative space for the GW Museum. As a part of the PUD, the University will also renovate the existing Woodhull House, which is a historic landmark. The University will also relocate and reconstruct a stair tower associated with Corcoran Hall in order to accommodate the footprint of the Project.

The Subject Property is currently located in the R-5-D Zone District, and in the Institutional Land Use category on the Future Land Use Map. The total gross floor area included in the Project is approximately 30,587 square feet, including 24,126 square feet of net new gross floor area on Site 102B. The total lot coverage included in the Project is approximately 10,116 square feet, including 7,300 square feet of net new building area on Site 102B. Upon completion, the project will have a total Floor Area Ratio (“FAR”) of approximately 2.21 and a lot occupancy of approximately 73%.² Flexibility to permit multiple buildings on a single record lot and for roof structures of unequal height is requested as a part of this application.

B. The Applicant

The Subject Property is owned by The George Washington University. The University, which was founded in 1821 and has been located in the Foggy Bottom neighborhood since 1912, combines the resources of a major international research university with the dynamics of a vibrant, urban setting in the heart of the nation’s capital. GW’s location is key to its mission and critical to its success, as the opportunities and resources surrounding the campus attract

² The Project will increase the lot occupancy of the underlying record lot, Lot 46, to approximately 52%. Under Section 210, the FAR for all residentially-zoned portions of the Campus is aggregated as detailed in the FAR Report. For informational purposes, the Project will increase the FAR of Lot 46 to 2.07.

outstanding students, faculty, and staff to GW and also help shape some of the University's most successful academic, research, and clinical programs. By capitalizing on its location, GW delivers an educational experience that is distinctive and rewarding – encouraging students to take advantage of opportunities in international finance, public policy, democratic governance, and many other pursuits that are truly unique to DC.

About the GW Museum

The George Washington University Museum will foster the study and appreciation of art, history, and culture, both within the University and throughout the global community, through its affiliation with The Textile Museum and through its University collections, including the Albert H. Small Washingtoniana Collection. The GW Museum will provide faculty, students, and other members of the GW community with opportunities for participating in research and academic programs through exhibitions, collection-based initiatives, and collaborative research projects. The GW Museum will also provide broader opportunities for education and outreach, such as through youth-oriented educational programs, internships and public programs such as workshops, lectures, symposia, and gallery talks.

About The Textile Museum

The Textile Museum ("TM") expands public knowledge and appreciation—locally, nationally, and internationally—of the artistic merit and cultural importance of the world's textiles. Founded in 1925 by George Hewitt Myers, the TM is an international center for the exhibition, study, collection and preservation of the textile arts. The TM collection encompasses more than 18,000 objects that date from 3,000 BCE to the present, including some of the world's finest examples of rugs and textiles from the Near East, Central Asia, East and Southeast Asia, Africa, and the indigenous cultures of the Americas. Included in the collection are extraordinary

holdings of the Islamic world and pre-Columbian textiles. The TM's 20,000 volume Arthur D. Jenkins Library of Textile Arts is among the world's foremost resources for the study of textiles.

The affiliation with the University will allow the TM to expand its rich tradition of scholarship, education, and cultural understanding as it broadly integrates its activities into the far-reaching GW academic community. Together, both institutions will further their goals and secure economies of scale in order to continue a robust program of exhibits, scholarship, educational activities, publications and public events.

About the Albert H. Small Washingtoniana Collection

Albert H. Small, a 2009 recipient of the Presidential Humanities Medal, has donated his unparalleled collection on the history of Washington, D.C., to The George Washington University. The Albert H. Small Washingtoniana Collection and the Center for National Capital Area Studies will be key elements of the GW Museum. The native Washingtonian's collection including rare maps, drawings, letters and documents, lithographs, books and ephemera is known as one of the most significant and extensive collections relating to the history and development of the District of Columbia. The GW Museum plans to digitize this collection to provide even more access to these prized artifacts.

C. Project Goals and Objectives and the Benefits of Using the PUD Process

Consistent with the goals of the District as outlined in the Land Use Element of the Comprehensive Plan as well as the goals of the approved Foggy Bottom Campus Plan, the University intends to redevelop the Subject Property in order to improve the utilization of land located in the heart of the Foggy Bottom Campus and establish the GW Museum, which will complement the academic and research mission of the University. This PUD will create a more attractive and sustainable use of the Property that is compatible with the Foggy Bottom Campus

and adjacent residential neighborhood. As a part of the PUD, the University will also renovate the historic Woodhull House and improve the surrounding streetscape.

The PUD process outlined in Chapter 24 of the Zoning Regulations, in conjunction with the campus plan process outlined in Section 210 of the Zoning Regulations, serve as the appropriate means of achieving the above objectives, because they provide the community and District agencies with the tools needed to ensure that the Project is well-designed and best meets the needs of the community while making sure that the density and uses are appropriate and the architecture is compatible with the surrounding neighborhood.

D. Development Timetable

The Applicant intends to start excavation of the Property in summer 2012 and expects that the construction period will last approximately 18 months.

II. OVERVIEW OF THE FOGGY BOTTOM CAMPUS PLAN AND FIRST-STAGE PUD

The Foggy Bottom Campus is generally located in the R-5-D Zone District as well as other zone districts.³ The Subject Property is located in the R-5-D Zone District and within the Campus boundaries. As such, university use is permitted pursuant to Section 210 of the Zoning Regulations, which permits college and university uses in residential zone districts provided that a campus plan has been approved for the campus. In Order No. 06-11/06-12, the Commission approved a new Campus Plan for the University's Foggy Bottom Campus as a means to provide for predictable, planned growth consistent with surrounding development patterns and guided by smart growth and transit-oriented development principles. The proposed Campus Plan incorporated a development plan, known as "Grow Up, Not Out," in reference to an effort to accommodate the University's forecasted academic and student housing needs within the existing Campus boundaries. The Plan calls for increased density targeted at specific development sites within the Campus boundaries that are generally concentrated towards the core of the Campus, away from residential areas. The additional space is required to further the University's academic mission and enhance the quality of its educational programs through new facilities that will address evolving technological and academic program needs (as is the case here) as well as increase the number of on-campus beds.

In conjunction with the Campus Plan, the University sought and received first-stage approval for a PUD for the Foggy Bottom Campus. The approved first-stage PUD identifies sixteen development sites referenced in the Campus Plan as future second-stage PUD projects, and identifies the uses, height, gross floor area, and lot occupancy for each second-stage PUD development site. In addition, a PUD-related Map Amendment for many of these development

³ Portions of the Campus are located in the R-5-E, SP-2, C-3-C, and C-4 Zone Districts either as the underlying zone district or through a PUD-related Map Amendment.

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

Since the approval of the Campus Plan / PUD in 2007, the University has moved forward with the implementation of many of the proffered benefits and amenities outlined in the conditions of the Commission's Order. The University has also moved forward with the implementation of the Campus Plan / PUD, and has received approval for three projects from the Commission, including a new underground parking garage and program space for the Law School (Z.C. Order No. 06-11A1/06-12A1), the Science and Engineering Hall (Z.C. Order No. 06-11B1/06-12B1), and the School of Public Health and Health Services (Z.C. Order No. 06-11C/06-12C). Construction of both the Law School garage/program space as well as the Science and Engineering Hall is underway, and construction of the School of Public Health and Health Services is expected to begin in January 2012.

The University has also moved forward with the implementation of other renovation projects and improvements to its Foggy Bottom Campus, including the renovation of the former Alumni House at 1925 F Street, the renovation of the Charles E. Smith athletic center, and

Lafayette Hall student residence facility. Finally, the construction of the mixed-use office, residential, and retail development at Square 54 (the old GW hospital site) approved by the Commission in Z.C. Order 06-27 is now complete and in operation.

III. THE PROPOSED PUD PROJECT

A. *Site Location*

The First-Stage PUD identified the infill area located between Woodhull House and Corcoran Hall in Square 102, near the intersection of 21st and G Streets NW, as a location for future development. The site was identified as Development Site 102B (“Site 102B”) and consists of approximately 9,730 square feet of land area. The Subject Property is comprised of Site 102B as well as the Woodhull House, and consists of approximately 13,831 s.f., or approximately 0.3 acres, of land area. Woodhull House is a two-story structure that is a historic landmark and is currently used as administrative offices for the University Police Department. The balance of the Subject Property (i.e. Site 102B) is open space and is currently used as a rose garden. Plantings from the garden will be transplanted to another site on Campus.

To the north of the Subject Property, along 21st Street, is Corcoran Hall, a four-story academic building that is also designated as a historic landmark. A stair tower associated with Corcoran Hall, which was constructed as an addition to the building and is not considered to contribute to its historic character, projects into the Subject Property. To the east of the Subject Property, along G Street, is Bell Hall, a four-story academic building. Other uses surrounding the perimeter of the square include other academic buildings largely associated with the GW Law School. The center of the square is a large open recreational green space that is known as the University Yard. The Yard is bounded by mature trees and contains a series of formal pathways that make pedestrian connections into and across the Yard. A popular public space, the Yard is heavily used by pedestrians as well as for formal events and informal gatherings. To the west of the Subject Property, across 21st Street, is the Hall of Government, a four-story academic building.

The Subject Property is located in the R-5-D Zone District and within the University's Foggy Bottom Campus. Surrounding property is also within the Campus and is located in the R-5-D Zone District. The Subject Property is also located within the boundaries of the proposed university historic district, and both Woodhull House and Corcoran Hall are designated historic landmarks. Because of the modifications to the historic landmarks as well as the character of the infill portion as an addition to a historic landmark, the design of the proposed Project will be reviewed by the Historic Preservation Review Board ("HPRB"). Application for concept design review was filed in late October and is expected to be considered by HPRB at its November meeting.

B. Project Description

The Subject Property is one of sixteen approved development sites for the Foggy Bottom Campus. The Campus Plan / PUD approved the construction of an academic/administrative/medical building on Square 102 at this location. In this application, the University seeks permission for the University's planned development of the Subject Property as the GW Museum, which is consistent with the above use designation.

As shown on the architectural plans, elevations, and drawings attached as Exhibit A, the Project consists of three components: the renovation of Woodhull House, the construction of an infill building along 21st Street between the Woodhull House and Corcoran Hall, and the relocation of an existing stair tower for Corcoran Hall ("Project"). The infill building will be connected to the Woodhull House and contain four above-grade and two below-grade stories of academic and administrative space for use as the GW Museum.

The primary entrance to the lobby of the GW Museum will be located off of 21st Street. A secondary entrance will be located off G Street in the Woodhull House. The Museum's gift

shop, accessed from the 21st Street lobby, will be visible to visitors and pedestrians from its 21st Street ground floor windows. The Museum's ground floor multipurpose room will enjoy views of University Yard with the ability to open and extend special events into the Yard. Pedestrian access between University Yard and 21st Street will be maintained through an exterior passage below the bridge connection to Woodhull House.

The design of the new Museum respects the unique character of the Woodhull House while creating a 21st century museum complex. The primary façade of the four-story addition will be composed of limestone, which will provide the gallery spaces with needed protection from daylight yet create visual interest through stone coursing and texture as well as a soft curve at the southwest corner. This curve, which contains an interior curved staircase that connects the building's galleries, bends the façade of the addition in a manner similar to Woodhull's curved bays. The limestone will be balanced by the use of glass panels for the remaining portions of the building, which will lighten the apparent mass of the new structure as well as provide a contemporary transition to the adjacent historic structures to the north and south. Similarly, the bridge that will connect the new Museum's upper level to the existing second floor of the Woodhull House will also contain glazing to soften the new structure as it approaches the two-story Woodhull House.

The massing of the building has also been designed to respect the adjacent historic landmarks. At the top story, the addition's fourth floor will set back approximately 8 feet, which provides a transition along 21st Street from Corcoran Hall to Woodhull House. Similarly, the Museum's service/freight elevator, which is needed to provide vertical circulation for large artifacts to the gallery spaces, was carefully sited away from Woodhull House and designed to minimize the visual impact against the adjacent Corcoran Hall to the north.

The unique and fragile nature of this museum's artifacts and collections requires a high degree of temperature and climate control not just within the gallery space, but also within spaces that are used to transport and off-load these objects. To this end, the Museum requires an internal, controlled, and secured loading berth within the building. Access to this service bay is proposed from a new curb cut along 21st Street. As discussed above, due to the need for temperature and climate control, the service bay doors will be closed even when loading activity is taking place. The University is investigating potential operational and physical controls that will minimize any potential impacts of the loading berth, and will provide more information in advance of the public hearing. Additional detail regarding loading and service activity is included in Exhibit H.

The Project will not include any on-site surface or below-grade vehicle parking. Bicycle parking spaces will be provided at street level adjacent to the pedestrian access into the University Yard. Streetscape improvements will be constructed along the entire frontage of the Subject Property consistent with the GW Streetscape Plan.

The proposed improvements will incorporate a series of sustainable features that will minimize the impact of the redevelopment. Potential stormwater managements are currently being explored, and technologies under investigation include a cistern to store and permit reuse of captured water for a combination of purposes such as irrigation, flushing of toilets, and make-up water for mechanical systems, absorption systems (e.g. green roofs), and dissipation systems (e.g. drain fields). The Project will not only meet GW's commitment to at least 16 points under LEED-NC 2.2, but also target a Silver Rating in the USGBC's LEED-NC 3.0 2009 Rating System.

C. Development Parameters Under the Approved First-Stage PUD

On the Subject Property, the Campus Plan / PUD authorized the construction of a new building devoted to academic/administrative/medical use with a height of 65 feet, gross floor area of approximately 26,271 square feet, and lot coverage of 8,757 square feet. The Campus Plan / PUD also called for the maintenance of a pathway or connection from 21st Street to the University Yard at the center of the Square.

The total gross floor area included in the Project is approximately 30,587 square feet, including approximately 24,126 square feet of net new gross floor area, and the total lot coverage of the Project is approximately 10,116 square feet, including approximately 7,300 square feet of net new lot coverage, for a total Floor Area Ratio ("FAR") of approximately 2.21 and a lot occupancy of approximately 73%. The Project will have a maximum height of approximately 65 feet. The pedestrian connection from 21st Street to the Yard will be maintained. The Project will contain no parking spaces, but will include a loading berth for trash and service accessed from 21st Street. The Project will be in full compliance with the Campus Plan and PUD.

	<u>Net New Approved in 1st Stage PUD</u>	<u>Net New Proposed in 2nd Stage PUD</u>
Height	65 feet	65 feet
GFA	26,271 s.f.	24,126 s.f.
Lot Coverage	8,757 s.f.	7,300 s.f.

D. Flexibility Under the PUD Guidelines

The PUD process was created to allow greater flexibility in planning and design than is possible under conventional zoning procedures. The PUD regulations specifically allow the

Zoning Commission to approve any zoning relief that would otherwise require approval of the BZA.

The University requests approval for multiple buildings on a single record lot as a part of this PUD. Currently, all of the existing improvements in Square 102 are located on a single record lot, Lot 46. Section 3202.3 requires a separate lot of record for each principal building. Here, in order to comply with this requirement, the University would be required to subdivide the square into new record lots for each building, which would not only require the creation of appropriately-dimensioned lots but also require HPRB approval for the four lots containing Woodhull House, Corcoran Hall, Stockton Hall, and President's House, all of which are historic landmarks. Therefore, flexibility from the record lot requirements is appropriate.

Such relief is ordinarily granted under Section 2516 of the Regulations, which permits the BZA to approve multiple buildings on a single record lot provided certain conditions are met. Here, however, the Commission is permitted to grant such flexibility under Section 2405.7 as a part of its overall approval of the PUD. Furthermore, the Commission need not apply the special exception standards normally applied by the BZA. See 11 DCMR § 2405.8. Arguably, based on extensive precedent in the District authorizing multiple university buildings on single lots, the requested relief is not required. Nevertheless, in recognition of the Foggy Bottom Campus's unique relationship to the formal grid system, the University requests such flexibility as a part of the PUD.

Relief is also requested to accommodate roof structure enclosures of unequal height. The Project includes both a traditional penthouse that serves the infill structure and a stairway penthouse for the relocated Corcoran Hall stairwell that is enclosed within a sloped roof. The sloped roof is shorter than the traditional penthouse to match the height and design of the

existing Corcoran Hall roof. Therefore, the relief is required to accommodate a roof structure that provides a transition from the new infill building to Corcoran Hall, which is a historic landmark.

IV. PLANNING ANALYSIS

A. Land Use Impact

As detailed in Section V, the proposed PUD project is fully consistent with the goals and policies of the Comprehensive Plan for the District of Columbia. Furthermore, the PUD represents the redevelopment of an underutilized site on the Foggy Bottom Campus as the GW Museum, consistent with the goals of the approved Campus Plan regarding the provision of new academic / administrative / medical space on the Foggy Bottom Campus. Many universities contain museums devoted to fine art, natural history, and other areas of interest as a part of their educational mission. These museums often provide co-curricular opportunities to enhance the academic and research activities of the institution as well as offer broader opportunities for public education initiatives and access to important, rare, and valuable artifacts. Within the District of Columbia, both American University and Howard University contain museums within their campus boundaries. The PUD will have a positive land use impact that is consistent with the Comprehensive Plan and other planning goals of the District of Columbia.

B. Zoning Impact

The proposed Project is consistent with the Commission's prior Campus Plan / PUD approval in Zoning Commission Order No. 06-11/06-12. The proposed use as the GW Museum is consistent with the Commission's approval of academic / administrative / medical uses for the development site in the Campus Plan and, as discussed above, museums are a common feature of many university campuses, including in the District of Columbia.⁴ Furthermore, the height,

⁴ Note that, in any event, a museum use is first permitted in the R-4 Zone District, and is therefore permitted in the Subject Property's R-5-D District as a matter of right.

gross floor area, and lot occupancy of the Project are well within the height, density, and lot occupancy approved by the Commission in the first-stage PUD.

C. Environmental Impact

As more specifically detailed in Exhibit F, no adverse environmental impact will result from the construction of the Project. Potential stormwater managements are currently being explored, and technologies under investigation include a cistern to store and permit reuse of captured water for a combination of purposes such as irrigation, flushing of toilets, and make-up water for mechanical systems, absorption systems (e.g. green roofs), and dissipation systems (e.g. drain fields). The University is targeting a Silver rating under the LEED-NC 3.0 rating system.

D. Facilities Impact

The proposed Project will not have an adverse impact on the facilities that it will rely on for service. The Foggy Bottom-GWU Metrorail station as well as numerous Metrobus lines—and the DC Circulator—all service the Foggy Bottom Campus, and it is expected that students, faculty, staff, and visitors will continue to use public transit. The Project will also improve the Campus' bicycle facilities through the provision of bicycle parking, which will promote the expanded use of cycling as an alternative to driving. The Project does not contain on-site parking and visitors to the Museum will likely choose to travel by public transportation or park in adjacent University parking garages. (Note that the Textile Museum does not offer any on-site parking in its current location.)

Wells + Associates, Inc., the traffic and parking engineer for this Project, has prepared a preliminary assessment of the proposed service entrance on 21st Street, which is attached as Exhibit H. As discussed in Exhibit H, the proposed loading dock is needed to accommodate the

Museum's special requirements for temperature and climate control of exhibits and artifacts, The assessment provides details on the anticipated loading needs for the Project, evaluates the proposed loading dock location and lack of adequate alternatives given the unique nature of the Yard, examines the potential impacts of the loading dock on pedestrian and vehicular traffic, and concludes that the proposed location will not have an adverse impact. As requested by DDOT, the University is investigating potential operational and physical controls that will minimize any potential impacts of the loading berth, and will provide more information in advance of the public hearing.

V. PUD EVALUATION STANDARDS

A. *Second-Stage Application Filing Requirements*

This application complies with the process and requirements set forth in Chapter 24 of the Zoning Regulations for review of a second-stage PUD application. Specifically, this application complies with the requirements of Section 2406.12 as follows:

- Area Requirement. The first-stage PUD encompasses approximately 1,669,744 square feet of land area, which exceeds the minimum area requirement of 15,000 square feet for a PUD in the R-5-D, R-5-E, C-3-C, C-4, and SP-2 Zone Districts.
- Notice. As stated on the certification attached as Exhibit D and as required by Sections 2406.7 to 2406.10 of the Zoning Regulations, the University provided notice of its intent to file a zoning application to (1) ANC 2A; (2) owners of all property within 200 feet of the proposed development site; and (3) the Foggy Bottom Association and West End Citizens Association, each of which were parties to the initial first-stage PUD.
- Section 2406.12(a). The completed application form is included in Exhibit B of this submission, along with an application for further processing of an approved campus plan.
- Section 2406.12(b). This statement provides detailed information on the location, number, size, and types of uses to be located in the project.
- Section 2406.12(c)-(f). Included in Exhibit A are plans, elevations, and sections that include a detailed site plan; detailed landscaping and grading plan; floor plans, elevations, and sections of the project as well as sections and elevations of the entire square in relationship to the project; and a final detailed circulation plan.
- Section 2406.12(g). This statement includes a narrative description of the project and its related features and impacts.
- Section 2406.12(h). This statement addresses the consistency of the application with the intent and purposes of the Zoning Regulations, the PUD process, and the first-stage approval of the Campus Plan / PUD.

B. *Additional Filing Requirements from Conditions of Approval*

Approval of the Campus Plan / PUD in Order No. 06-11/06-12 was based on a number of conditions that govern future second-stage PUD applications for development sites within the

approved Campus Plan. The University's compliance with these conditions is briefly discussed as follows:

- Condition P-14: Second-Stage PUD Required for Development Resulting in Additional Density or a Change in Use. Condition P-14 requires that, except for minor renovation projects including those necessary to address building code compliance, no development on Campus resulting in additional density or change in use is permitted unless approved by the Commission as a second-stage PUD. Such development is limited to the sites identified in the Campus Plan / PUD at the uses, zoning, gross floor area ("GFA"), lot occupancy, and height called for in the approved plan. Here, the proposed Project is located on the approved Square 102B development site, and is consistent with the use, zoning, GFA, lot occupancy, and height for that development site.
- Condition P-15: Satisfaction of Further Processing Standards. As discussed in Section VI below, the University has satisfied its burden of proof under Sections 210 and 3104 of the Zoning Regulations.
- Condition P-16(a): Compliance with the Zoning Regulations and Approved Campus Plan. As detailed herein, the application complies with the applicable provisions of the Zoning Regulations as well as the contents of the approved Campus Plan, including the use, zoning, height, gross floor area, and lot occupancy limitations for the Square 102B development site.
- Condition P-16(b): Demonstration that Use, Height, Bulk, and Design is Sensitive to and Compatible with Adjacent and Nearby non-University Owned Structures and Uses. The proposed Project is generally surrounded by University properties and will not have an impact on non-University structures and uses. Furthermore, the Project has been sensitively designed to be compatible with adjacent historic landmarks.
- Condition P-16(c): Interim Leased Space for Activities Either Displaced by Construction or Intended to be Located Permanently in the Completed Structure. No interim leased space is located for activities displaced by construction or intended to be located permanently in the completed structure.

The University Police Department will relocate from its existing offices at the Woodhull House to the Academic Center, and the rose garden will also be relocated on the Foggy Bottom Campus.

- Condition P-16(d): FAR Report. As detailed in the report attached as Exhibit I, the University's existing FAR within the Foggy Bottom Campus Plan boundaries is 3.23, including buildings that are currently under construction within the Campus. Upon completion of the proposed improvements as well as all other improvements currently approved by the Zoning Commission or under construction, the University's FAR on the Foggy Bottom Campus will be 3.18. This FAR Report will be submitted directly to OP and the Zoning Administrator and is attached as Exhibit I.

- Condition P-16(e): Foggy Bottom Campus Plan Compliance Report. The University's Fall 2010 Compliance Report is attached as Exhibit J and demonstrates full compliance with the approved Campus Plan.
- Condition P-16(f): Streetscape Plan Implementation Progress Report. As detailed on the progress report attached as Exhibit K, the University has worked with DDOT, OP, and other District agencies, as well as community representatives, to finalize its streetscape master plan and begin the implementation of streetscape components of the Campus Plan / PUD.
- Condition P-16(g): Off-Street Parking Space Census. The University continues to meet its requirement to provide at least 2,800 off-street parking spaces. As detailed on the parking census attached as Exhibit L, as of October 2011, the University provided a total of 2,484 off-street parking spaces, with capacity for 2,909 through the use of valet/attendant parking. This includes 350 off-street spaces located at the Kennedy Center; the University's interim use of such off-campus parking resources was permitted due to the redevelopment of the former site of the University Parking Garage.

Upon the completion of this Project as well as all other improvements currently under construction or approved by the Zoning Commission, the University will have a new total of nearly 3,400 parking spaces (including self and valet spaces), well above the required minimum of 2,800 spaces.⁵ A full accounting of the existing number of off-street parking spaces is attached as Exhibit L.

- Condition P-16(h): Transportation Management Program Status Report. Led by its Transportation Management Coordinator, the University has implemented a comprehensive transportation management plan ("TMP") to promote alternatives to driving and eliminate adverse traffic and parking impacts. As detailed on the status report attached as Exhibit M, the University has successfully publicized and promoted transportation alternatives.
- Condition P-16(i): Advisory Committee Consultation. The University presented the Square 102B PUD project to the Advisory Committee at a regularly-scheduled meeting on August 29, 2011 (the sixteenth quarterly meeting of the Advisory Committee). Notice of the meeting was provided to ANC 2A, FBA, and WECA, as well as through publication in the Foggy Bottom Current and via electronic notice. The second-stage PUD was the featured topic of discussion at the meeting. Certification of the presentation to the Advisory Committee as well as copies of the meeting minutes are attached as Exhibit N. The University also introduced the project to ANC 2A at the ANC's regularly-scheduled July 20, 2011 public meeting. The University returned to the ANC on October 19th to present the concept design of the Project prior to the November 2011 EPRB meeting, and expects to continue to engage the Advisory Committee, ANC 2A

⁵ Other projects with parking currently under construction or approved by the Zoning Commission include Square 103 and Square 55.

and representatives of the Foggy Bottom/West End community regarding the project leading up to the public hearing.

- Condition P-16(j): List of Outsourcing Activities. The University has not, in any 30 day period since the filing of the Square 39 second-stage PUD, terminated 50 or more Foggy Bottom faculty or staff who were assigned to a specific University department or unit and then permanently replaced them with contractors or other persons not employed by the University.
- Condition P-17: Substantial Compliance. As demonstrated by the attached Compliance Report, the University is in substantial compliance with the conditions of the Campus Plan / PUD.

C. Public Benefits and Project Amenities

Section 2403.9 provides categories of public benefits and project amenities for review by the Zoning Commission. The objective of the PUD process is to encourage high-quality development that provides public benefits and project amenities by allowing applications greater flexibility in planning and design than may be possible under matter-of-right zoning. This second-stage application will achieve the goals of the PUD process by implementing many of the benefits and amenities called for in the first-stage PUD, including exemplary design and planning, vehicular and pedestrian improvements, historic preservation, uses of special value, and environmental benefits.

1. Urban Design, Architecture, and Landscaping

Section 2403.9(a) lists urban design, architecture, and landscaping as categories of public benefits and project amenities for a PUD. As shown on the detailed plans, elevations, and renderings included in Exhibit A, the proposed Project exhibits many characteristics of exemplary urban design, including use of high-quality materials, pedestrian-oriented landscape and hardscape improvements, clear separation of pedestrian and vehicular entrances and

circulation patterns, inclusion of features that promote alternatives to driving, and sustainable features.

2. Site Planning, and Efficient and Economical Land Utilization

Pursuant to Section 2403.9(b) of the Zoning Regulations, “site planning and efficient and economical land utilization” are public benefits and project amenities to be evaluated by the Zoning Commission. The site is currently vacant and fails to fully capitalize on its location at the center of the Foggy Bottom Campus. The proposed Project will provide an appropriately-sized infill development that respects the design and mass of adjacent historic landmarks as well as the pedestrian-oriented uses within the University Yard.

3. Effective and Safe Vehicular and Pedestrian Access and Transportation Management Measures

The Zoning Regulations, pursuant to Section 2403.9(c), state that “effective and safe vehicular and pedestrian access” can be considered public benefits and project amenities of a PUD. The proposed Project will promote pedestrian safety through the provision of a well-sited primary pedestrian entrance to the Museum, maintenance of pedestrian access to the University Yard from 21st Street, and protection of pedestrian and recreational activity in the Yard through the location of the service entrance on 21st Street. The Project also includes bicycle parking.

Wells + Associates, Inc., the traffic and parking engineer for this Project, has prepared a preliminary assessment of the proposed service entrance on 21st Street, which is attached as Exhibit H. As discussed in Exhibit H, the proposed service entrance will not have an adverse impact on pedestrian or vehicular traffic. The University is investigating potential operational and physical controls that will minimize any potential impacts of the loading berth, and will provide more information in advance of the public hearing.

4. Historic Preservation

Pursuant to Section 2403.9(d), historic preservation of public or private structures is considered to be a public benefit and project amenity of a PUD. Here, the PUD will permit the renovation of Woodhull House, a historic landmark, and provide an infill addition that is designed to be compatible to both Woodhull House and Corcoran Hall. Because the infill addition is an addition to a historic landmark, the proposed design of the Project will be reviewed by the Historic Preservation Review Board. An application for concept review of the Project will be filed in late October, and it is expected to be considered by HPRB at its November 2011 public meeting.

5. Environmental Benefits

Section 2403.9(h) states that environmental benefits are considered to be public benefits and project amenities of a PUD. Potential stormwater managements are currently being explored, and technologies under investigation include a cistern to store and permit reuse of captured water for a combination of purposes such as irrigation, flushing of toilets, and make-up water for mechanical systems, absorption systems (e.g. green roofs), and dissipation systems (e.g. drain fields).

6. Uses of Special Value

Section 2403.9(i) lists uses of special value to the neighborhood or the District of Columbia as a whole as public benefits and project amenities of a PUD. As described above, the proposed GW Museum will serve as a use of special value to the entire District community, including the immediate neighborhood, through the provision of educational and cultural opportunities. Residents of the District—including residents of the Foggy Bottom/West End neighborhood—will have continued access to a vibrant community space that offers art and

cultural enrichment experiences through exhibitions and educational programs that build cultural understanding, increases knowledge of local, national and international history, and foster arts appreciation. The Museum will provide opportunities for education and outreach through youth- and family-oriented educational programs, free hands-on activities, internships, and public programs such as workshops, lectures, symposia and gallery talks. District of Columbia students involved in the Museum-School Partnership and curriculum-based museum school tours will learn about diverse world cultures as well as the history of the District of Columbia. And local teachers will benefit from training and tools to integrate arts learning in the classroom.

7. Comprehensive Plan

According to Section 2403.9(j), public benefits and project amenities include “other ways in which the proposed planned development substantially advances the major themes and other policies and objectives of any of the elements of the Comprehensive Plan.” As described in greater detail in Section VII, the PUD is consistent with and furthers many goals and policies of the Comprehensive Plan.

VI. FURTHER PROCESSING EVALUATION STANDARDS

A. *College or University which is an Academic Institution of Higher Learning*

The George Washington University was chartered as an educational institution of higher learning by act of Congress dated February 9, 1821.

B. *The Use is Located so that it is Not Likely to Become Objectionable to Neighboring Property*

For the reasons set forth below, the University's proposed use of the Subject Property is not likely to become objectionable to neighboring property.

1. Noise

As discussed in detail during the Campus Plan / PUD process, activities within the Campus Plan boundaries are located and designed to minimize objectionable impacts on the neighboring community. In the Campus Plan / PUD Order, the Commission concluded that the University's student conduct initiatives intended to minimize noise generated by its student population were appropriate and effective in avoiding objectionable impacts due to noise. Order at 8-9 (FOF 34-35). As detailed in the attached Compliance Report, the University has continued to maintain and refine these measures to address these potential impacts. The proposed Project furthers these goals by locating the Museum within the heart of the Foggy Bottom Campus, away from non-University residential neighbors, and in any event the proposed uses within the Museum are unlikely to generate any objectionable noise levels.

2. Traffic

In the Campus Plan / PUD Order, the Commission concluded that the existing and future levels of service surrounding the Foggy Bottom Campus were acceptable and that the University would not impose objectionable traffic impacts provided it continued to implement

transportation management measures. Order at 9-10 (FOF 39-42). As discussed above, the University has continued to maintain and supplement its TMP measures to minimize traffic impacts. Consistent with the approved Campus Plan / PUD, the proposed Project will not impose objectionable traffic impacts, because it does not add any existing parking supply for its associated vehicle trips. It is anticipated that most of the Museum visitors will come by means other than passenger vehicle, such as by public transportation. Those that do drive to the Museum will be able to park in existing and planned GW parking facilities as well as other available public parking facilities in the nearby area.

3. Parking

In the Campus Plan / PUD Order, the Commission found that the Campus Plan would not create objectionable conditions due to parking because the University planned to maintain an adequate minimum number of parking spaces on campus and did not propose any increase in the number of faculty and staff above the previously approved levels. Order at 10 (FOF 43-45). The Commission also found that the University's proposed dispersal of parking to underground garages would generate positive environmental, site utilization, pedestrian, and traffic impacts. Order at 15-16 (FOF 65(e)).

Here, the proposed improvements will not create objectionable conditions due to parking. Users of the Museum are expected and will be encouraged to use public transportation, walk, or bike to the new building, or park in one of the University's nearby parking garages.

4. Number of Students or Other Objectionable Conditions

As described by the Commission in the Campus Plan / PUD Order and reaffirmed in its most recent Order on Remand, the Commission found that the Campus Plan would not create objectionable conditions due to the number of students.

C. Compliance with the Maximum Bulk Requirement

The property within the Campus Plan boundaries is zoned R-5-D, R-5-E, SP-2, and C-3-C, and the rezoning of certain sites to C-3-C and C-4 has been approved in conjunction with the first-stage PUD. As affirmed by the Zoning Commission in the Campus Plan / PUD Order, the Zoning Regulations limit the permitted development in the residentially-zoned portions of a campus to be aggregated to a total based on the allowable FAR in the relevant zone district, not to a specific number. See Order at 26-27 (COL 8). Here, the residentially-zoned portions of the Foggy Bottom Campus are in the R-5-D and R-5-E Zone District, and are aggregated to the maximum permitted FAR in the R-5-D Zone District, which has a maximum density of 3.5 FAR as a matter of right and up to 4.5 FAR achievable through the PUD process. Upon full buildout of the Campus Plan / PUD, the proposed density for the residentially-zoned portions of the Campus will be approximately 3.69 FAR, less than the density of 4.5 FAR permitted under the PUD process in the R-5-D zone. As demonstrated in the attached FAR Report, upon completion of the proposed project as well as all other improvements currently pending before the Zoning Commission or under construction, the FAR for the residentially-zoned portions of the Campus will be 3.18, which is well within the permitted FAR.

D. Submission of a Plan for Developing the Campus as a Whole

The University's plan for developing the Campus as a whole, as required under Section 210.4 of the Zoning Regulations, was approved by the Zoning Commission in the Campus Plan / PUD Order, affirmed by the Court of Appeals, and re-affirmed by the Commission with respect to the methodology for counting the number of students on the Foggy Bottom Campus. The approved Plan included details on buildings, parking, and loading facilities; screening, signs,

streets, and public utility facilities; athletic and other recreational facilities; and a description of all activities and of the capacity of all present and proposed development. The proposed construction, including its uses, height, density, lot occupancy, and open spaces are consistent with the approved Campus Plan.

E. No Interim Use of Land is Proposed

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

F. No New Use Sought for Approved Site of Buildings Moved Off-Campus

The University does not seek approval for any new use of a previously-approved building site to be moved off-campus.

G. Compliance with the Policies of the District Elements of the Comprehensive Plan

As discussed in detail in Section VII below, this application complies with the policies and goals of the Comprehensive Plan.

H. The Proposed Buildings are within the Floor Area Limit for the Campus as a Whole

As discussed above, upon full buildout of the Campus Plan / PUD, the proposed density for the residentially-zoned portions of the campus will be approximately 3.69 FAR, less than the density of 4.5 FAR permitted under the PUD process in the R-5-D zone. As demonstrated in the attached FAR Report, following the completion of the Project, as well as all other improvements currently pending before the Zoning Commission or under construction, the FAR for the residentially-zoned portions of the Campus will be 3.18, which is well within the permitted FAR.

I. Referral to the District of Columbia Office of Planning and District Department of Transportation

University representatives have met with the D.C. Office of Planning and District Department of Transportation regarding the proposed Project, and the application will be referred to both agencies for their review and report.

VII. COMPLIANCE WITH THE COMPREHENSIVE PLAN

The proposed PUD is consistent with and fosters numerous goals and policies in the Comprehensive Plan.

The purposes of the District elements of the Comprehensive Plan for the National Capital are to: (1) Define the requirements and aspirations of District residents, and accordingly influence social, economic, and physical development; (2) Guide executive and legislative decisions on matters affecting the District and its citizens; (3) Promote economic growth and jobs for District residents; (4) Guide private and public development in order to achieve District and community goals; (5) Maintain and enhance the natural and architectural assets of the District; and (6) Assist in the conservation, stabilization, and improvement of each neighborhood and community in the District.

D.C. Code § 1-301.62 (2006). The Commission previously found that the Campus Plan / PUD was consistent with the Comprehensive Plan and would further the objectives and policies of the Plan including the land use, urban design, and preservation elements of the Plan, as well as the Ward 2 elements. See Order at 16-17 (FOF 68-69). The proposed Project significantly advances these purposes by furthering the social and economic development of the District through the continued improvement of the University and, in particular, fulfilling policies and goals that promote partnerships between universities and arts institutions in the District.

A. Land Use Maps

The Property is located in the Institutional land use category on both the Future Land Use and Generalized Policy maps. The Framework Element provides guidelines for using the Future Land Use and Generalized Policy Maps. This Element states that the Future Land Use map should be interpreted “broadly” and that zoning for an area should be guided by the Future Land Use Map interpreted in conjunction with the text of the Plan. The Element also clearly provides that density and height gained through the Planned Unit Development process as bonuses that may exceed the typical ranges cited for each land use category. The Element also states that, for

institutional land, “change and infill can be expected on each campus consistent with campus plans,” 10 DCMR § 223.22, and changes in use should be “comparable in density or intensity to those in the vicinity, unless otherwise stated in the Comprehensive Plan Area Elements or in an approved Campus Plan.” 10 DCMR § 226.1(h).

In its consideration of the Campus Plan / PUD, the Commission found that the uses, buildings, and zoning changes described in the first-stage PUD were compatible and consistent with the Institutional land use designation of the campus and the character of the surrounding neighborhood. Here, the proposed infill project and its related uses are consistent with the approved Campus Plan and are compatible with the nearby mix of commercial, institutional, and residential uses.

B. Land Use Element

The Land Use element includes a series of policies applicable to institutional uses. It notes that these institutions make an important contribution to the District economy, with colleges and universities alone spending over \$1.5 billion annually and employing tens of thousands of workers. Policy LU-3.2.1 calls for support of ongoing efforts by District institutions to mitigate their traffic and parking impacts through the promotion of alternatives to driving such as bicycling and other transportation demand management measures. Policy LU-3.2.2 encourages large institutions such as universities to be corporate role models as they improve the physical environment through high quality architecture and design and expanded use of sustainable building methods. The proposed Project will further the above goals and policies.

C. Other Citywide Elements

Implementation of the approved Foggy Bottom Campus Plan will continue to permit the University’s Foggy Bottom Campus to thrive and evolve, which furthers important policies and

goals of the Economic Development and Education Elements of the Comprehensive Plan. The Economic Development Element notes that educational services, as one of the 20 largest private sector industries as well as one of the top 15 projected high growth industries in the District, are a “core” District industry. See Policy ED-1.1.2. In recognition of this importance, the Comprehensive Plan specifically “supports growth in the higher education” sector based on its potential to create jobs and income opportunities as well as enhance District cultural amenities. See Policy ED-2.4.1.

The development of this site as a new home for the GW Museum will also satisfy goals and policies in the Comprehensive Plan related to arts and culture. The partnerships that will help create the GW Museum are particularly supported by Policy AC-4.2.3, which calls for the promotion of “continued collaboration” between universities and arts and culture institutions to “develop additional arts facilities and programs” in the District. See also Policy AC-4.2.2 (calling for partnerships between universities and arts organizations to enhance arts programming, funding, and facility development). The location of the GW Museum on the Foggy Bottom Campus is fully consistent with Policy AC-3.2.1 of the Plan, which calls for the development of cultural amenities “beyond the Mall” to more fully capitalize on the economic benefit of tourism; at the same time, the location near the Mall and close to public transit will hopefully promote greater use and appreciation of the exhibits and resources offered at the Museum. Furthermore, the partnership between the GW Museum and Albert H. Small will provide a home for permanent display of the Albert H. Small Washingtoniana Collection and Center for National Capital Area studies within the Museum, which will provide access to rare maps, documents, books, and other materials related to the development of the District of Columbia. The display of this noteworthy collection will serve as a showcase for the rich history

of the District as well as a resource for archival records, which supports the overall goals of Action Item AC-2.1.C.

Implementation of the approved Campus Plan through this Project is also consistent with Educational Element policies that encourage University growth and development through the campus plan process and attention to community issues and concerns. Policy EDU-3.3.2; EDU-3.3.3. Furthermore, the specific features of this Project implement the Education Element's call for good "corporate citizenship" by universities through commitments to high-quality design and inclusion of low-impact development features. See Policy EDU-3.2.2; see also Policy LU-3.2.2. The Project also includes measures intended to mitigate traffic and parking impacts, which is supported by the Comprehensive Plan's Education Element. See Policy EDU-3.3.5.

The Project will also further other citywide elements of the Comprehensive Plan, including the Transportation, Environmental Protection, Historic Preservation, and Urban Design, and Parks and Open Spaces Elements.

- Consistent with the policies of the Transportation Element, the Project reinforces the University's continued commitment to transit-oriented development anchored by the Foggy Bottom-GWU Metrorail station, as well as encouragement of transportation demand management and pedestrian- and bicycle-related improvements. See T-2.2 – T-2.4; T-3.1 – T-3.2. In particular, this Project provides improvements to the pedestrian streetscape and bicycle storage, thus fulfilling "action" items of the Comprehensive Plan. See Action T-2.2.C; Action T-2.3.A.
- The proposed Project incorporates many of the features called for the Environmental Element, including the use of permeable materials, landscaping, and green roofs to reduce runoff. See Policies E-3.1.1 to E-3.1.3.
- The design of the proposed building provides an infill development of a strategic but underutilized site that will satisfy multiple goals of the Urban Design and Historic Preservation Elements, through infill development that relates to the scale of surrounding buildings (UD-2.2.1, UD-2.2.7); new development that complements the form, height, and bulk of historic landmarks (UD-2.2.2 and HP-2.4.3); maintenance of the established façade lines and form along the block (UD-2.2.6); protection of the integrity of historic buildings (HP-2.4.5); and promotion of the appropriate preservation and adaptation of historic structures (HP-2.4.1 and HP-2.4.2).

Finally, the Campus Plan is consistent with the Near Northwest Area Element. The Advisory Committee formed under the Campus Plan provides improved communication and coordination between the University and its neighbors, as called for under Policy NNW-2.5.1. Furthermore, the Campus Plan calls for increasing density on the campus to meet future space and facility needs, consistent with Policy NNW-2.5.3. At the same time, the Campus Plan and related PUD include mitigation measures, benefits, and amenities designed to ameliorate the traffic, parking, housing, and other impacts of the University and improve the character of the area as a whole. The Project will further these efforts by providing increased density within the core of the campus and other features that ensure an attractive and sustainable development.

VIII. CONCLUSION

For the foregoing reasons, the University submits that the enclosed applications meet the standards of Section 210 and Chapter 24 of the Zoning Regulations; are consistent with the purposes and intent of the Zoning Regulations and Map; will enhance the health, welfare, safety, and convenience of the citizens of the District of Columbia; satisfy the requirements for approval of the included applications; provide significant public benefits; and advance important goals and policies of the District of Columbia. Therefore, the second-stage PUD application and further processing application should be approved and adopted by the Zoning Commission.

Accordingly, the University respectfully requests that the Zoning Commission set the PUD application down for a public hearing at the earliest possible date.

Respectfully submitted,

GOULSTON & STORRS, PC

_____/s/_____

Maureen E. Dwyer

_____/s/_____

David M. Avitabile

Date: November 2, 2011