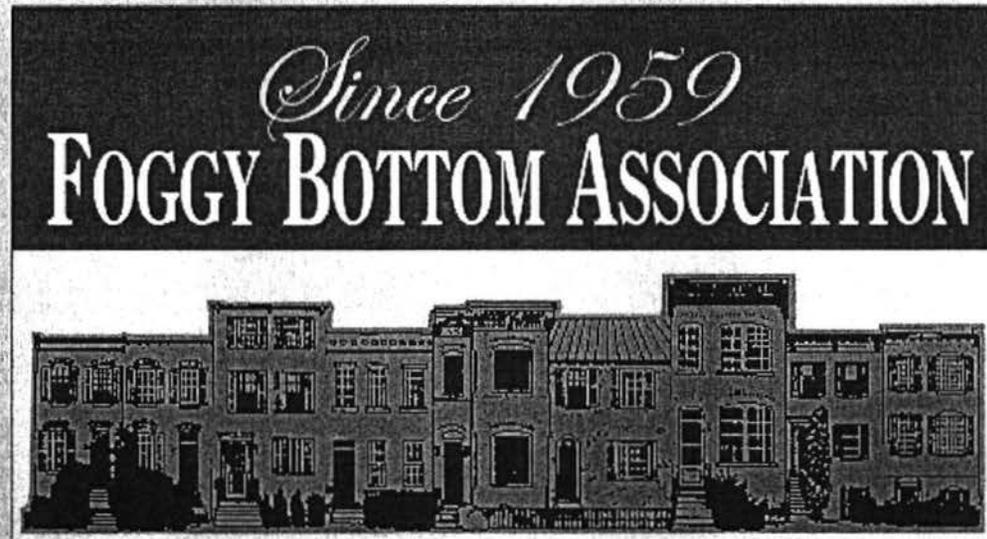


George Washington University Campus Plan 2006-2025 and PUD Applications



Testimony of the Foggy Bottom Association
September 25, 2006

ZONING COMMISSION
District of Columbia
CASE NO. DC-11
ZONING COMMISSION
District of Columbia
CASE NO. 06-11
EXHIBIT NO. 187
EXHIBIT NO.187

Why are we here?

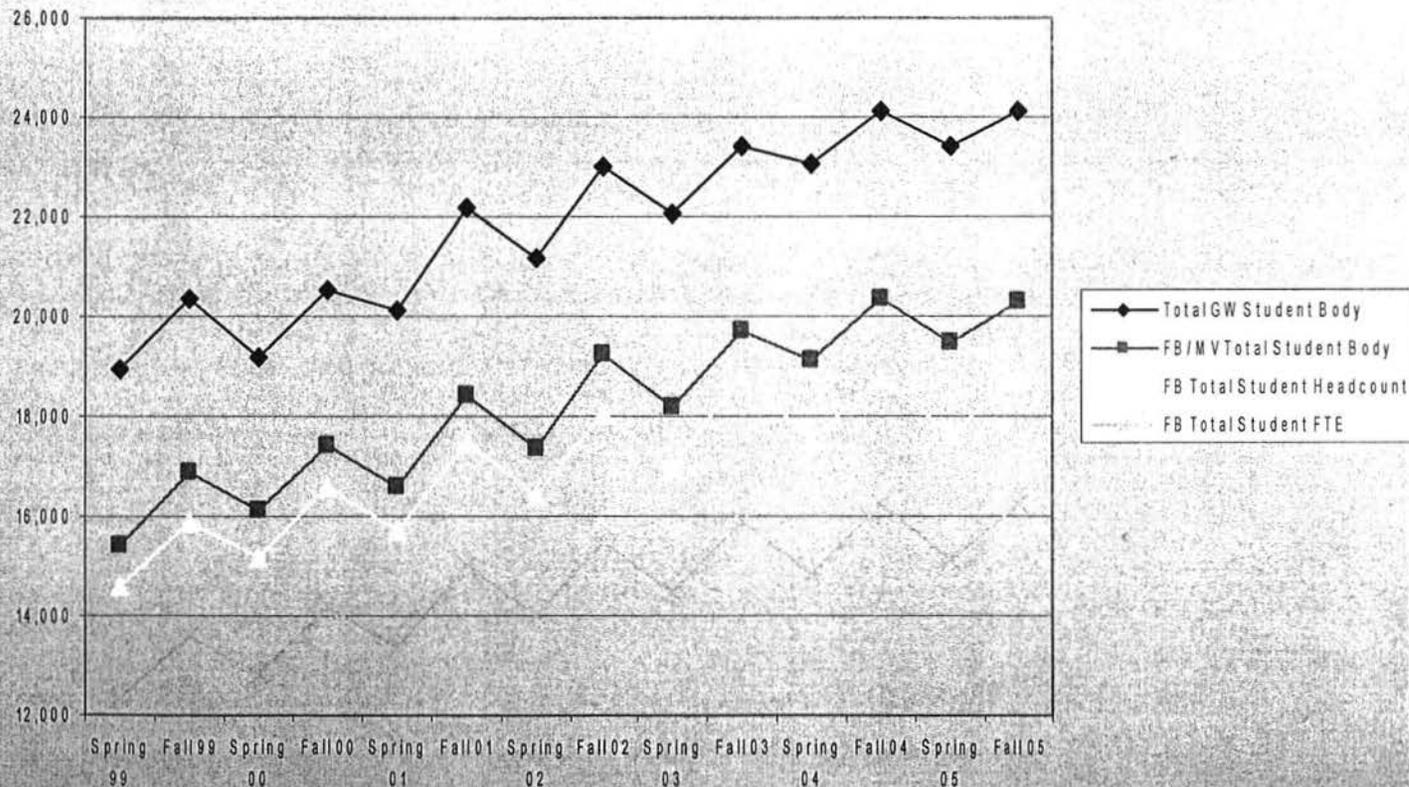
- No good reason to discard valid 2000 Plan.
 - Some steps taken to identify the problems identified in 2000 in terms of housing, noise, student behavior, etc.
 - Enforcement remains the key problem.
 - GWU has shown no compelling need to change timetable. Proposed 20-year period dubious.
 - Only rationale is that GWU has decided what it wants to do on Square 54. That's not enough.
 - Let's see how 2000 Plan runs its course and is enforced before deciding what to do next.

Neighborhood still under siege

- Despite 2000 Plan, major problems remain.
 - 1800 undergraduates and 14,000 other GWU students are not housed on campus.
 - In many places, “on campus” is directly abutting “off campus.”
 - Three-day weekends of parties, drinking and noise.
 - GWU draws crowds, not just students. Major sports and other events – like living near MCI Arena.
 - Sheer numbers of students and visitors traveling on sidewalks crowding neighbors.
 - Incident report system is inadequate to deter students.
 - Negative effects spread beyond campus.
 - Special problems owing to the transient nature of student population causes major upheaval throughout the year.
 - Move-in and move-out times go on for weeks. Particularly disruptive to permanent residents.

Over-enrollment still a problem

GWU Enrollment Categories



Over-enrollment still a problem

- GWU has over 24,000 students enrolled.
- Alleged compliance with 2000 Plan is achieved only by omitting thousands of students.
- GWU compliance reports omit specific numbers.
- GWU changed its counting methodology along the way.

Over-enrollment still a problem

- Audit was designed to address these issues, but ...
 - Zoning Administrator relied on GWU's definitions for counting students.
 - The audit did not examine faculty or staff numbers.
 - The audit did not count students (such as continuing education students) who come to campus and have an impact on the intensity of usage of the neighborhood.
 - The audit did, however, suggest that GW would be out of compliance on FTE student count for Fall 2005 under a methodology counting students coming to FB.

Over-enrollment still a problem

- Focus should be on total intensity of use of Foggy Bottom campus.
 - Need to count ALL students (and others) using the campus, even if students are housed elsewhere. Otherwise a huge loophole exists.
 - Count faculty and staff separately. No reason to combine the two.
 - Any headcount standard should be clear and simple – and without loopholes.

Over-enrollment still a problem

- GWU's proposed 20,000 cap offers no protection.
- GWU conditions contain several loopholes:
 - GW would omit students who take classes at Foggy Bottom, but live elsewhere. Would be easy to bring in students from Virginia.
 - No enforcement if GWU in “substantial compliance,” whatever that means.
 - Limits on GWU buying property are ineffectual.
 - Student discipline program ineffectual.
- If Commission to accept GW's new methodology, it should lower the cap.

Addressing the problem

- Any cap changes should set a limit that realistically measures the impact of usage of the Foggy Bottom campus.
- To the extent the Commission uses headcount, the standard should be objective, clear and enforceable.
- If you are inclined to move to GWU's definition, you should lower the cap.

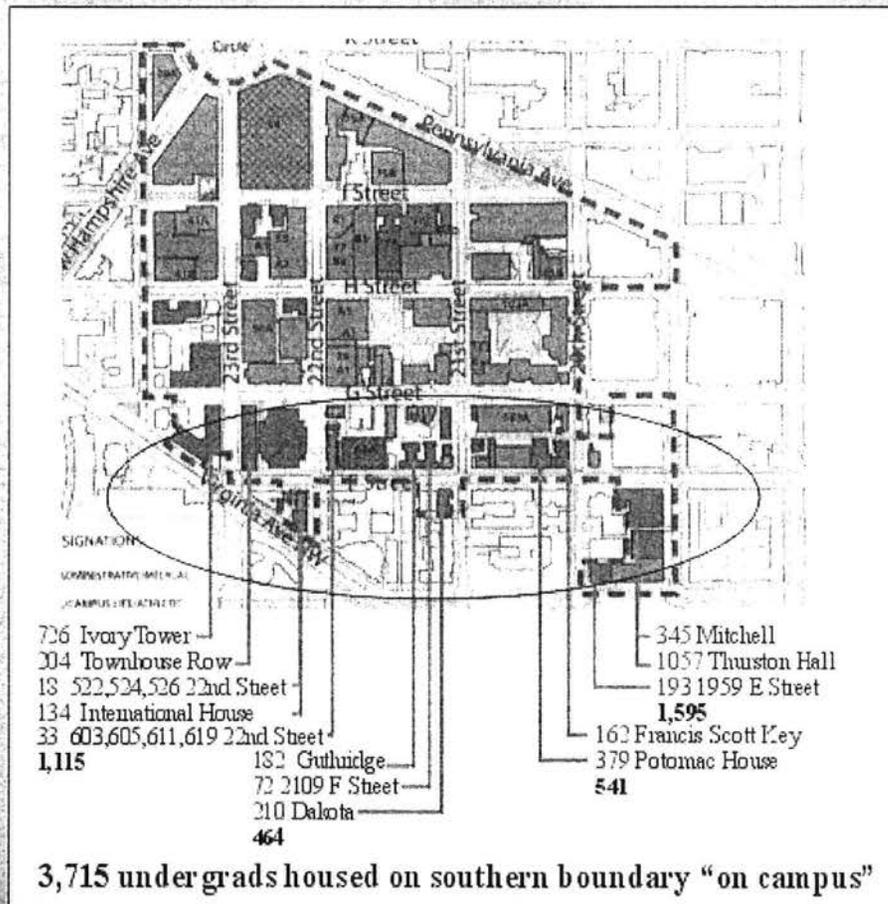
Campus Plan criteria not met

- GWU and OP make no effort to show that additional development would not be objectionable based on noise, traffic, number of students, other objectionable criteria.
- Focusing instead on PUD amenities. GWU seems to concede more density means more problems, but tries to paper that over by focusing on alleged amenities.

No reason to use PUD process

- Special Exception route the only method in the Zoning Regulations to deal with the specific problems of allowing universities in a residential neighborhood.
- Section 210 limits are appropriate for special exception use in a residential zone — less density.
- Nothing in the Regulations contemplating a campus-wide PUD.
- Most of the controls sought by OP can be achieved through Section 210.

“On-campus” residential density already concentrated on south end of neighborhood



“Amenities” cannot lessen the blow

- Creation of new campus historic district would not constrain GWU to operate solely within the Campus Plan boundaries.
- GWU can — and does — operate outside Campus Plan boundaries.
- GWU can keep expanding, *e.g.*, buying residential buildings. Limits ineffective.
- Neither a historic district nor any of the other “amenities” is worth new construction equivalent to 75% the size of the Pentagon in Foggy Bottom.
- No provision for mitigation of community resources already damaged or destroyed by GWU’s development. Square 43 townhouses, President’s House, St. Mary’s Episcopal Church, Catholic Indian Mission.

In short . . .

- GWU proposing a major increase in FAR (density).
- It would mean more traffic, more activity, more noise, more negative effects on the neighborhood.
- Headcount (however defined) is not a sufficient measure of the total impact. The focus should be on the intensity of uses of the campus.
- No need to adopt a new Campus Plan now. Let's see how the current one works.

Planning Issues as to GWU Campus

Testimony of
George H.F. Oberlander, AICP

Current GWU Campus Plan

- Current Campus Plan valid until June 2009.
- It authorizes construction of an additional 950,000 sq. ft. GFA.
- GWU's current magnitude: 5,600,000 sq. ft.
 - Equals 28 average size downtown office bldgs.
- 2000 Campus Plan warned of “tipping point” concerns.

Additional GFA objectionable

- GWU asking for 1,700,000 more GFA
- Does not include additional 900,000-1,000,000 sq. ft GFA on Sq. 54, Sq. 80.
 - Like adding 8 or 9 more downtown office bldgs.
- OP and the Commission can't evaluate this proposal without those Squares.
- § 210.4—Evaluate “campus as a whole.”

Making the current Plan work

- The Commission has an obligation to examine effectiveness of conditions BZA imposed to make sure that the limits are effective and can be enforced.
 - PP. 2-4 of testimony discuss issues raised by the application.
 - Statement also analyzes carryover and new conditions.
 - All reasons why applications should be denied.
 - PP. 4-7 provide detailed comments and questions on the proposed conditions.

PUD “amenities”

- No significant public amenities or economic benefits in OP report.
- Shalit report on GWU shows the limited economic benefits of letting GWU grow as a development strategy.
- GWU’s “commitment” to not develop outside approved sites not effective.

Not a proper PUD application

- PUD process does not provide for an extensive, overall PUD under Chapter 24.
 - Not limited to specific development proposals.
 - 5 lot assemblages/development sites (Squares 41, 55, 56, west sides of 77, 79)
 - Covers only GW-owned properties, yet private properties within PUD boundaries.
 - Comparisons to Washington Hospital Center are not valid (*See* maps with planning report).
 - No context for rezoning to C-3-C.

“Grow up, not out”

A slogan, not a planning strategy.

- No planning justification for what GWU proposes in the Comprehensive Plan.
- Building taller in the center (mostly) does not reduce overdevelopment impacts.
- Impacts still objectionable to neighboring properties due to noise, number of students and other objectionable conditions (210.2).
- Sec. 210.3’s intent “to prevent unreasonable campus expansion into improved low-density districts.”
- Statement at pp. 4-8 discusses inadequacy and limitations of OP report.

Comprehensive Plan

- Institutional Designation — § 1340.2.
- § 1358 (p. 13-52) — The “expansion of George Washington University has resulted in the diminishment of housing.”
- This “and other commercial usage is of grave concern.”
- “University generated traffic (already) has had a negative effect on residential Foggy Bottom.”

Making matters worse

- Adding 1,700,000 sq. ft. will exacerbate existing adverse conditions.
- OP report does not examine over-development.
- No study of trip generation for the new 1,700,000 sq. ft.
- 3.65 FAR proposal for a currently zoned residential area exceeds maximum allowed under § 210.
- Rezoning to C-3-C “circumvents” § 210 density maximums.
- Adding 1,000,000+ sq. ft. from Sq. 54 and Sq. 80 will transform the limited existing residential character into a complete university area.

Traffic Issues Related to GWU Campus

Testimony of Joe Mehra, P.E.

Existing Conditions

- Truck data are not provided (deliveries, trash, etc.)
 - This can impact levels of service.
- Existing queues not provided.
- Spillback onto adjacent intersections not provided for existing conditions – impacts levels of service.



Existing Traffic Data

- Observed counts do not match data used to compute levels of service.
- For example: 21st Street at Eye Street.
 - Observed volume is 634 in PM peak hour;
 - LOS analysis used 434;
 - Results in better levels of service .

Peak Hour Determination

- Wells report states Street peak is 8:30-9:30 AM and 5:30-6:30 PM; GWU peak is 8:00-9:00 AM and 5:00-6:00 PM OR Half Hour overlap only.
- Wells data shows that 23 out of 31 intersections have street peak earlier than 8:30-9:30 AM.
- Wells data shows that 21 out of 31 intersections have street peak earlier than 5:30-6:30 PM.
- Inference – Street peak and GWU peak are at about the same time.

Existing GWU Trip Generation

| <u>Peak Hour</u> | <u>Based on Parking</u> | <u>Based on Travel Survey</u> | <u>Based on ITE Report</u> |
|------------------|-----------------------------|---------------------------------------|--------------------------------|
| AM Peak | 804 | 1522 | 3948 |
| PM Peak | 909 | 862 | 3948 |

Possible Reasons for Discrepancies

- Assuming 25% more trips to calculate the level of on-street parking is too conservative.
- Report states that about 2,500 travel survey responses received; Table 3-2 shows 2,470 responses, Table 3-3 shows 3,080 responses.
- Faculty/Staff generates only 1 trip for 13.6 employees in PM versus 1 trip for 3 employees in AM.

Future Traffic Projections

- Assumed 0.5% per year Background Growth; DDOT Study used 1% per year growth.
- GWU growth in trips based on incorrect assumptions.
- GWU growth in vehicle trips does not include non-GWU bus travel from other campuses.
- Total trips forecasted as much as 400 vehicles per hour less for some movements.

Levels of Service

- 9 out of 37 Intersections analyzed are failing today (LOS E or F).
- With GWU expansion, 16 out of 37 intersections will fail based on Wells Report.
- Using corrected data an additional 6 intersections may fail.
- After mitigation, 15 out of 37 intersections still fail.
- Mitigation results in loss of curbside parking.

TMP/Conclusions

- Wells analysis is flawed.
- No specific or binding actions are presented.
- Unlikely to result in any vehicle trip reductions.
- Inconsistencies and deficiencies in GW report undercut any Commission reliance on this report.

