

ZONING COMMISSION  
District of Columbia

**Dorothy Miller**  
Commissioner ANC 2A05

CASE NO. 06-11  
EXHIBIT NO. 202

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**September 28, 2006, Statement Re. ZC Case No. 06-11/06-12  
George Washington University Campus Plan 2006-20025**

Good Evening. I am Dorothy Miller, Advisory Neighborhood Commissioner for Single Member District 2A-05. I live at Columbia Plaza in which GWU now has a 28.55% ownership but has even more control over what is rented to whom.

**Issue #1 – length of Campus Plan**

GWU is recommending the period of the plan be 20 years. A time horizon of 20 years for a campus plan does not make sense for two reasons.

First, circumstances will change dramatically over 20 years. In planning ahead whether for a campus, a city, a business, or even one's life -- the level of uncertainty increases significantly as the time horizon moves outward. That is why planners use the rule of thumb of looking backward twice the period of looking forward to think about rates of change and their impacts. Thus to get an idea how circumstances may change 20 years out, one would have to look backward 40 years. Think for a moment about all the issues effecting higher education since 1966. Think about how the campus looked in 1966. One must reasonably conclude that approving a 20 year plan with all its legal implications and commitments is not in the District's or the neighborhood's best interest.

Second, based on GWU's history in following through – or more significantly, not following through – on commitments, it may be questionable whether even a 5-year plan would be too long, much less the more typical 10-year plan. Now, half way through the current 10-year plan, GWU already has violated some commitments, such as total enrollment. At least, during the campus plan approval process, oversight on such concerns as commitment violations can be more focused than on-going oversight, when each request for a specific development comes before the District and the neighborhood.

**Issue #2 – Use of PUDs**

A PUD is one approach to developing a site. Whether a PUD is appropriate depends upon circumstances at the time the specific site. A campus plan typically

identifies potential uses for each site, not the approach to developing each site. (In fact there are those who argue that PUDs are not appropriate within campus plan boundaries since, in one sense, the overall plan itself has some characteristics of the PUD -- for example total development rather development of each specific site according to the underlying zoning. While I agree with this position, this is not the appropriate forum to discuss it.)

To predetermine that virtually all development that will occur within the campus plan boundaries should use PUDs, gives GWU a totally free hand in the development process without any tradeoff discussions with the District and the neighborhood. We understand why GWU would want these understandings and commitments by the District in the campus plan; however other than for ease of administration during implementation, we cannot understand why the District's Planning Office would want to give up all negotiation opportunities up-front. We believe that designation of a site in the campus plan as a PUD is inappropriate and should be removed.

Thank you.