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June 9, 2006

Via Hand Delivery

Ellen M. McCarthy
Director
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ZONING COMMISSION
District of Columbia

CASE NO. 06-11

EXHIBIT NO. 07

2006 JUN 12 PM 2:20

D.C. OFFICE OF ZONING

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Re: George Washington University Planned Development

Dear Director McCarthy:

We represent the Foggy Bottom Association ("FBA"), and write concerning the recent filing of George Washington University ("GW") entitled, "Square 54: Application to the District of Columbia Zoning Commission for Consolidated Review and Approval of a Planned Unit Development and Zoning Map Amendment" (the "Square 54 PUD"). On behalf of the FBA, we ask that the Office of Planning ("OP") issue a recommendation to the D.C. Zoning Commission that the Square 54 PUD is without merit and, accordingly, that it should *not* be set-down for a Zoning Commission hearing.

Alternatively, we request that the OP issue a recommendation to the D.C. Zoning Commission that the Square 54 PUD be consolidated with GW's "Foggy Bottom Campus Plan: 2006-2025" (No. ZC-06-11) (the "new campus plan"). As you are aware, GW's new campus plan is presently pending before the Zoning Commission. The Zoning Commission has scheduled four days of public hearings, beginning on September 14, 2006, regarding the new campus plan. The Square 54 PUD and new campus plan are tightly interrelated, though inexplicably filed separately. In fact, the division of the Square 54 PUD and the new campus plan appears to be a ruse by GW to conceal the magnitude and negative impact of its overall development plan. The Zoning Commission should consolidate the Square 54 PUD and new campus plan, and thereby undertake its review with a full appreciation of the overall scheme proposed by GW.

The Square 54 PUD contemplates a massive, multi-million dollar construction project on Square 54, which is located within GW's campus plan boundaries. As the Square 54 PUD itself states, the proposed project is unique in its "location, size [and] prominence." The proposed Square 54 PUD will significantly impact GW's future plans, growth, and operations. The Square 54 PUD will also substantially impact the surrounding Foggy Bottom neighborhood. GW recognizes the intertwined nature of the Square 54 PUD and new campus plan, stating, "[the Square 54 PUD is] key to achieving the goals and objectives set forth in [the new campus plan.]"

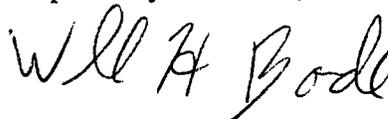
ZONING COMMISSION
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EXHIBIT NO.27

The FBA reiterates its objections to the OP's and/or the Zoning Commission's consideration of *any* applications by GW while GW is in violation of the existing Campus Plan. Such consideration is in plain violation of Condition 9(e) and Condition 20 of the existing Campus Plan, which prohibit such consideration if GW is not compliance with any other Conditions. GW is presently in violation of the student-housing housing requirements, student headcount cap, and faculty headcount cap set forth in Conditions 8 and 9 of the existing Campus Plan. Condition 9 obligates GW to provide at least 7,190 beds on campus or outside of Foggy Bottom for its full-time undergraduate students. However, according to its February 28, 2006 bi-annual submission to the Zoning Commission, GW currently provides only 5,580 such beds. According to GW's Office of Institutional Research ("OIR"), the GW office responsible for compiling statistics, GW's "Enrollment and Persistence" statistics indicate that GW enrolls 27,051 students – *more than 7,000 in excess of the Condition 8 cap*. GW's faculty headcount exceeds the cap of 2,236 set forth in Condition 8. The OIR states that GW employs 4,478 faculty – *more than double* the permissible number of faculty.

In addition, the FBA objects to the OP's consideration of the Square 54 PUD prior to the development of an Environmental Impact Statement ("EIS"). There can be no doubt that the Square 54 PUD is a "major action" pursuant to §§ 6-982 & 6-983 of the DCEPA. The Square 54 PUD includes 870,000 square feet of gross floor area, 333 dwelling units, 454,000 square feet of office space, and 84,000 square feet of retail space. Such a massive undertaking is plainly a "major action," and therefore requires an EIS. Because no such EIS has been prepared, any consideration of the Square 54 PUD must, at a minimum, be postponed.

The FBA recognizes that the OP and Zoning Commission have previously disregarded GW's serious violations and the FBA's objections. Therefore, if the OP recommends that the Zoning Commission consider the Square 54 PUD, the OP should also recommend that the Square 54 PUD be consolidated with GW's new campus plan. It is vital that the Zoning Commission appreciate the complete scope of GW's development proposals, because the Square 54 PUD and new campus plan would result in combined impacts on the Foggy Bottom neighborhood. These combined impacts would not be clear if the proposals were considered independently. The FBA requests that the public hearings beginning September 14, 2006 include consideration of the consolidated Square 54 PUD/new campus plan, or that the public hearings beginning September 14, 2006 be postponed until such time that the Square 54 PUD and new campus plan have been sufficiently consolidated and reviewed by the OP.

Respectfully submitted,



William H. Bode

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