

THE GEORGE WASHINGTON UNIVERSITY

FOGGY BOTTOM CAMPUS PLAN: 2006 – 2025

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D.C. OFFICE OF ZONING

ZONING COMMISSION
District of Columbia
CASE NO. 06-11
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JULY 13, 2006

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*A VISION FOR THE FOGGY BOTTOM CAMPUS
THAT OFFERS SHARED AND LASTING BENEFITS FOR
THE COMMUNITY, THE DISTRICT, AND THE UNIVERSITY*

FILED IN CONJUNCTION WITH APPLICANT'S PRE-HEARING STATEMENT
JULY 13, 2006

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SECTION 1: INTRODUCTION

1.1 The George Washington University and the Foggy Bottom Campus

The George Washington University, founded in 1821 and rooted 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 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. For example, the strength of GW's School of Public Health is due in part to the fact that more than 500 public health organizations are located in the vicinity of the Foggy Bottom campus.

But the District of Columbia is much more than monuments and politics – it is made up of many distinct neighborhoods that together create the fabric of a unique and diverse city. The University values the Foggy Bottom and West End neighborhoods of which it is a part and recognizes that a thriving community is a key component of the *GW Experience* for those who study, teach, research, and work here.¹

Development of the Foggy Bottom Campus is currently governed by the *Foggy Bottom Campus Plan: Years 2000 through 2009*. Since the adoption of the existing Campus Plan, the University has followed a building program that has resulted in the addition of over 2,000 undergraduate beds on campus while also providing outstanding and state-of-the-art academic, student activity and recreational facilities. Looking toward the future and beyond the expiration of the current Campus Plan, several factors shaped the University's planning efforts which resulted in this new Campus Plan. Among these key considerations are the fundamental constraints of limited space and financial resources; a desire to proactively address concerns expressed by residents of the surrounding neighborhoods with respect to University growth and development; and the unique opportunity presented by the redevelopment potential of Square 54, the former GW hospital site. At its core, the development plan set forth in this Campus Plan – and the proposed redevelopment of Square 54 as a mixed-used “town center” – reflects a vision of a world-class university within a dynamic and vibrant neighborhood that offers shared and lasting benefits for the Community, the District, and the University.

1.2 Accommodating GW's Space Needs: “*Grow Up, Not Out*”

The Need For Space

The forecasted space needs of the University proposed in this Campus Plan are not aimed at accommodating increased student, faculty or staff populations beyond those which are already approved under the existing Campus Plan. Rather, the forecasted facilities growth is required to

¹ For additional information about the University and its mission, see Exhibit A: About the George Washington University, Exhibit B: Mission and Accreditation, and Exhibit C: University Charter. A map illustrating GW's location in the District of Columbia, including surrounding neighborhoods and landmarks, is included as Exhibit D: The Campus Within the City.

further GW's core academic mission and enhance the quality of the University's educational programs.

Development of new and modernized facilities responsive to evolving academic and technological needs – for example, a state-of-the-art Science Center, modern classrooms with integrated technology, and cutting edge laboratories – are essential to maintain GW's status as a world-class university, enhance its unique interdisciplinary programs, and continue to attract top-tier students and faculty.

GW acknowledges and is committed to addressing the demand for on-campus student housing and to complying with the existing Campus Plan housing condition which requires that, effective fall 2006, GW make available 5,600 on campus beds – to accommodate 70% of its full-time Foggy Bottom undergraduate population up to an enrollment of 8,000 – and one bed for every full-time Foggy Bottom undergraduate student in excess of 8,000. In fact, the Campus Plan housing requirement aligns with GW's own institutional goals and priorities to create an outstanding undergraduate “living and learning community.” To this end, GW has added more than 2,000 beds on campus since the adoption of the existing Campus Plan, has identified additional housing capacity in existing residence halls, and is finalizing construction of 379 new beds scheduled for delivery in fall 2006. As part of this proposed Campus Plan, the University has identified sites to accommodate up to 1,000 additional beds², including a public-private partnership project with the School Without Walls (currently pending review by the Zoning Commission) that would yield approximately 474 beds. Overall, the University's existing on-campus housing facilities, coupled with aforementioned School Without Walls project and the student housing development proposed by this Plan, would result in a bed inventory that meets GW's projected student housing needs and exceeds the Campus Plan housing requirement.

“Grow Up, Not Out”

A fundamental principle guiding this Campus Plan is the goal of accommodating GW's forecasted academic and housing space needs within the existing Foggy Bottom Campus Plan boundaries. By doing so, Square 54 can be developed as a mixed-use “town center” to provide the campus and the community with a unique neighborhood gathering place and also generate revenue necessary to support the University's academic mission. This goal can be realized by increasing development density on certain areas of campus and providing the University the opportunity to “*Grow Up, Not Out.*” This strategy provides for predictable, planned growth consistent with surrounding development patterns and guided by “smart growth” and transit-oriented-development planning principles; preserves and enhances the District's tax base by making more efficient use of properties already owned by the University and utilizing Square 54 for commercial purposes; and addresses community concerns regarding University expansion into surrounding residential neighborhoods outside the Campus Plan boundaries.

A Predictable Yet Flexible Plan

The Foggy Bottom campus provides a natural transition between the lower-scale residential community and the densely-developed Central Business District (CBD). The increased

² In the event site 101A is used for student housing, the Plan yields approximately 1,100 new beds. The Plan proposes that Site 101A be used for either academic or residential use. The University will continue to maintain adequate student housing resources to comply with the student housing requirement, even in the event site 101A is used for academic purposes.

development rights sought under this Plan result in an overall campus density that remains lower than much of the surrounding built environment which has been developed to a 6.0 to 10.0 FAR (with the exception of the lower-scale Foggy Bottom Historic District located to the west of campus).

This Plan calls for the deliberate location of increased density at appropriate sites in accordance with surrounding development patterns, while maintaining a scale that creates a campus environment conducive to the GW living and learning experience through a balanced combination of open spaces, retained architectural and historic resources, and high-quality new development. The Plan reflects a long-term view of the campus in the context of the surrounding neighborhoods and creates a framework for campus development through the next 20 years, providing predictability of identified sites, uses and densities along with the requisite level of flexibility as to timing and phasing of specific projects given the duration of the Plan.

1.3 Square 54: A Unique Opportunity

The Square 54 site, adjacent to the Foggy Bottom-GWU Metro and at the “front door” of the campus and the Foggy Bottom and West End neighborhoods, presents a key transit-oriented development location and an opportunity to create a new urban “town center” with retail, residential, and office uses that would achieve shared benefits for the Community, the District, and the University. For the Community, Square 54 presents the opportunity for neighborhood-serving retail and services (including a contemplated grocery store), and a community gathering place. For the District, the mixed-use development would create jobs, generate tax revenues, and bring additional residents to the city. For the University, the redevelopment of Square 54 represents a major source of non-enrollment driven revenue to fund the core academic mission of the University that will also enhance the unique urban campus experience for students, faculty and staff who study, live and work in Foggy Bottom.

The Square 54 redevelopment project is being led by the developer team of Boston Properties and KSI Services, Inc. The team has actively participated in the University’s community-based planning efforts and submitted a separate consolidated Planned Unit Development (PUD) application for the redevelopment of Square 54 on May 30, 2006.

SECTION 2: THE COMMUNITY-BASED PLANNING PROCESS

For over a year leading up to the filing of this Campus Plan, the University engaged in a comprehensive planning effort to fully explore and evaluate the future development of the Foggy Bottom campus. Working with the DC Office of Planning (OP), GW designed an open and inclusive community-based planning process to gather input from all interested stakeholders. The process drew upon various planning resources, including land use planners, architects, traffic consultants, and historic preservation experts.

2.1 Foggy Bottom Campus & Neighborhood Study

Upon OP’s recommendation, GW retained Ehrenkrantz, Eckstut & Kuhn Architects (EE&K), a design firm with extensive urban planning expertise (particularly within the District), to evaluate and envision the future of the Foggy Bottom campus in the context of the surrounding neighborhoods (the Foggy Bottom Campus & Neighborhood Study). The Study included a

comprehensive review of GW's existing campus facilities and space resources, with the goal of determining how the University's forecasted academic and student housing space needs could be accommodated within the existing Foggy Bottom campus. EE&K's work was consistently informed by community input, which was sought through a variety of means under the guidance and direction of an independent community facilitator.

Along with ANC-2A and OP, GW co-sponsored a series of open community meetings between June and September 2005 to discuss the future of the Foggy Bottom campus, including Square 54. In addition to the structured community meetings, the University sponsored "office hours" and other small group meetings with the community facilitator and EE&K to further discuss plan details and community issues. (Exhibit E: Community-Based Planning Process: Meetings & Events) The meetings yielded planning principles, design concepts, and ultimately, a framework plan for future development on the Foggy Bottom campus that accommodates GW's forecasted academic and student housing space needs and is responsive to issues raised by neighborhood residents. Community input, issues and concerns raised during the series of meetings were captured and documented in a comprehensive "Issues Exhibit" developed by the community facilitator and the co-sponsors. The University also established the www.neighborhood.gwu.edu website as a public resource for information and process-related materials, including the EE&K scope of work, all meeting presentations, meeting summaries, and the Issues Exhibit. The website also provides a mechanism for community members to provide feedback or request additional information online or by contacting the community facilitator directly.

In addition to the public meetings and events associated with the community-based planning process, over the past several months representatives of the University have met with numerous community groups, local institutions, businesses, churches, and members of the GW community (including the board of trustees, faculty, staff, students and alumni) to gather feedback and comments on the University's proposed development plans as they have evolved throughout the planning process.

Finally, in the weeks immediately prior to the filing of this Campus Plan, the Office of Planning and the University each convened independently-sponsored community meetings to inform members of the community about the proposed Campus Plan, and discuss how the development plan has changed and evolved as a result of input received through the community-based planning process and further guidance provided by the Office of Planning, including historic preservation staff.

2.2 Urban Land Institute Advisory Services Panel

In May 2005, GW and the Office of Planning convened a three-day Urban Land Institute (ULI) panel to evaluate the redevelopment potential of Square 54 and recommend appropriate uses and densities for the site.³ The ULI panel undertook an independent and comprehensive evaluation of Square 54, including reviewing extensive background, demographic and market research materials, conducting interviews with key stakeholder groups (including members of the Foggy Bottom and West End communities), and participating in site, campus, and city tours.

³ Established in 1936, ULI is a nonprofit education and research organization that fosters and encourages high standards of land use planning and development. The members of the panel chosen to evaluate Square 54 were selected by ULI from their membership, based on their expertise in areas relevant to the challenges and opportunities presented by the site.

The ULI panel presented its preliminary findings at the end of the panel exercise and also in a formal report issued in September 2005, recommending mixed-use commercial development of Square 54 at a density between 7.0 and 8.0 FAR, under the assumption that GW demonstrates the ability to accommodate its forecasted academic and student housing space needs on the balance of the Foggy Bottom campus. The ULI panel further supported the University's "*Grow Up, Not Out*" development strategy, and suggested that an aggregate campus density of 5.0 would be appropriate given the surrounding built environment and context of the campus. (Exhibit F: September 2005 ULI Report: A Redevelopment Strategy for Square 54)

The Square 54 developer team has integrated the ULI panel's findings as well as feedback gathered throughout the community-based planning process into its continued planning activities, and this input is reflected in the recently-filed Square 54 PUD application.

SECTION 3: THE DEVELOPMENT PLAN

The development plan set forth in this Campus Plan accommodates the University's forecasted academic and student housing space needs, carries out objectives of the District of Columbia Comprehensive Plan, reinforces existing campus development patterns, and reflects the various planning principles and design concepts developed through the inclusive and collaborative community-based planning process. A draft "framework" development plan incorporating these planning considerations was presented on September 20, 2005 at the conclusion of the series of co-sponsored community meetings. The development plan has been further refined since September 2005 through additional input and guidance from the Office of Planning, including review by historic preservation staff and a comprehensive historic resources evaluation of the Foggy Bottom campus.

3.1 Campus Character and Development Patterns: The Diversity of "Campus Streets"

Throughout the planning process, the diversity of the campus has been articulated through the differentiated character of various "campus streets." While the north-south streets running through campus are predominantly vehicular travel corridors, the more pedestrian-oriented east-west streets help define and shape the existing and proposed campus activity and development patterns.

1. *I Street.* I Street is an active corridor with an existing mix of complementary uses (e.g., academic, residential, and retail). The development plan contemplates the creation of a unique and dynamic retail corridor along I Street, providing key campus and neighborhood-serving retail services. The I Street retail corridor concept would help create a critical mass of retail extending from the I Street Mall at the Foggy Bottom-GWU Metro to The Shops at 2000 Penn by incorporating ground floor retail in University facilities as they are redeveloped over time. (Exhibit G: I Street Rendering and Exhibit H: I Street Retail Corridor)
2. *H Street.* H Street serves as the primary "campus street" with active pedestrian traffic, particularly between the many academic and student-focused facilities and the open spaces where students, staff, neighbors, and visitors often congregate (e.g., Gelman Library, Marvin Center, Kogan Plaza, University Yard). H Street is a key location for

future academic facilities and residential development in the active core of campus. (Exhibit G: H Street Rendering)

3. *G Street.* G Street, while not as active as H Street, also exhibits a strong campus presence, with its own distinct scale and character. The development plan specifically responds to this unique experience and pedestrian scale of existing buildings along G Street, and calls for new development that will complement the existing built environment and the maintenance of identified historic and architecturally relevant buildings. (Exhibit G: G Street Rendering)
4. *F Street.* F Street serves as an important transitional street between the campus and private residential and institutional uses. The development proposed for F Street maintains the diverse and articulated scale of buildings, ranging from lower-scale townhouses to buildings 90 feet in height. As a result of input received during the community-based planning process, several sites originally identified by GW for redevelopment along F Street were removed from the development plan, to alleviate concerns raised about concentration of density – and specifically the development of additional student housing – on the periphery of campus, and also in recognition of the historic and architectural significance of several buildings located on the street.
5. *Pennsylvania Avenue and Washington Circle.* Pennsylvania Avenue and Washington Circle serve as the prominent “front door” of the campus and gateway to the Central Business District, supporting taller (up to 130 feet) and denser buildings than the balance of campus. The University’s major medical center facilities, including the GW Hospital, Ross Hall (GW Medical School) and the Ambulatory Care Center (the Medical Faculty Associates clinical practice), are located in this area of campus. Development along Pennsylvania Avenue is proposed to remain consistent with its commercial and higher-density character, while development on Squares 41 and 39 has been reduced in scale to 90’ in response to input gathered during the community-based planning process.

3.2 Development Sites and Uses

The plan identifies 18 development sites within the existing Foggy Bottom Campus Plan boundaries (Exhibit I: Development Sites), each individually designated in accordance with the following use categories:

- Academic/Administrative/Medical (generally referred to as “academic”): includes classrooms, laboratories, libraries, faculty offices, administrative offices, hospitals, clinics, medical libraries, conference facilities, parking, auxiliary services, and related support functions
- Residential/Campus Life/Athletic (generally referred to as “residential”): includes housing (both temporary and long-term for students and other tenants), fraternities and sororities, athletic facilities, auxiliary services, and student activity facilities
- Commercial/Investment: includes commercial and/or income producing properties

⁴ The Plan identifies 18 sites including Square 54 and site 80A, which are the subject of separate consolidated PUD applications.

The 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. In three specific cases, sites are designated for potential alternative uses, to provide an appropriate measure of flexibility given the duration of the Plan and the evolving nature of University programming and planning considerations. In addition, the first floors of several development sites located on I Street are contemplated to include retail space in support of the I Street Retail Corridor concept

The Development Program Summary included in Exhibit J details the proposed height, site coverage, gross square footage, and, as applicable, net new beds and parking spaces, for each development site.

3.3 Building Height and Lot Coverage Guidelines

Building height and lot coverage guidelines are key elements of the development plan. These guidelines allow for more efficient use of individual development sites and provide the opportunity to maintain important open spaces (e.g., University Yard, Kogan Plaza) and preserve lower-scale architectural and historic buildings on the balance of campus. This approach acknowledges the importance of planning the future of the campus as a whole, rather than as a series of unrelated individual sites.

Specifically, the Plan calls for heights up to 130' along Pennsylvania Avenue, consistent with the existing commercial zoning and surrounding high-density environment; up to 110' along 22nd Street in the central area of campus, reflecting the intensity of existing and proposed University uses and the desire to concentrate density in the campus core and away from the neighboring residential community; and up to 90' on the balance of campus, while remaining sensitive to certain areas where a lower scale for new development is appropriate (e.g., buildings surrounding the University Yard). (Exhibit K: Building Heights)

Lot coverage guidelines are informed by the use of the specific site. For residential purposes, a 75% lot coverage guideline is generally appropriate so as to provide an environment conducive for such use (e.g., allowing for proper windows, circulation, access, etc.). Academic uses, however, can afford a higher lot coverage and thus a 90% lot coverage guideline is generally appropriate. With respect to a potential commercial development site on Pennsylvania Avenue (site 75A), 100% lot coverage is appropriate given the infill nature of the site. The specific lot coverage for each development site will be evaluated and determined when the particular project is submitted for second-stage review by the Zoning Commission.

3.4 Historic Preservation

Over the past decades, the University has maintained a strong commitment to preserving important architectural and historic resources on the Foggy Bottom campus. During this time, a number of existing buildings on the campus have been listed with the National Register of Historic Places or have been identified as DC Historic Sites. As a result, the existing built environment of the campus provides a diverse composition of old and new structures of varying scale and design.

3.4.1 Campus Architectural And Historic Preservation Study

As part of the community-based campus planning process, the University and its architectural and historic preservation consultants, in coordination with the Office of Planning and Historic Preservation Office staff, conducted an in-depth campus architectural and historic preservation study. As a result of this effort, the University's original development plan was significantly modified to preserve important campus resources. For example, several development sites along G and F Streets – which included buildings not currently listed as National Register or DC Historic Sites but which were identified as historically and/or architecturally significant through the architectural resources study – were removed from the University's initially-proposed development plan. Also, while numerous historic resources will be preserved intact on campus, certain other buildings will be appropriately modified. Specifically, architecturally significant portions of The West End building at 2124 I Street, Crawford Hall at 2119 H Street, and Schenley Hall at 2121 H Street will be retained while the rear portions will be demolished and redeveloped, and a rear addition is proposed for Lafayette Hall at 2100 I Street to complement the existing building.

3.4.2 Foggy Bottom Campus Historic Preservation Plan

In addition to influencing the development plan set forth in the *Foggy Bottom Campus Plan: 2006 – 2025*, the collaborative architectural and historic preservation study has resulted in the development of a comprehensive Historic Preservation Plan for the Foggy Bottom campus that celebrates the unique campus environment and urban fabric of Washington, DC through the preservation of individual buildings and collections of historic properties. This coordinated approach to preservation and planning is a fundamental component of the *Foggy Bottom Campus Plan: 2006 – 2025* and is aimed at ensuring that appropriate campus resources are identified, preserved, and maintained while accommodating the University's forecasted academic and student housing space needs on the balance of campus. Specifically, the Preservation Plan proposes a potential historic district on the Foggy Bottom campus as well as the landmark designation of seven additional campus buildings beyond those already designated. (Exhibit W: Foggy Bottom Campus Historic Preservation Plan)

3.4.2.1 Potential GW Foggy Bottom Campus Historic District

The potential GW Foggy Bottom Campus Historic District proposed as part of the Foggy Bottom Campus Historic Preservation Plan includes the largest remaining concentration of buildings from the late-19th century in the Foggy Bottom/West End neighborhood, notable early-20th century apartment houses, and the historic core of The George Washington University Foggy Bottom campus. The proposed potential district includes areas where the historic character of campus is most evident, specifically along the southern edge of the campus along F and G Streets. The potential district also includes the original university quadrangle (University Yard) and older campus buildings dating from the mid-1920s to the early-1950s which document the evolution of the University in Foggy Bottom. Also within this potential historic district are several blocks of the campus that include largely intact Victorian rowhouses intermixed with taller early-20th century apartment houses. (Exhibit W: Foggy Bottom Campus Historic Preservation Plan includes a map of the potential historic district.)

3.4.2.2 Proposed Historic Landmarks

Seven new proposed historic landmarks have been identified as part of the Foggy Bottom Campus Historic Preservation Plan. These historic landmarks relate to the historic context of late-19th century development of the Foggy Bottom and West End areas and of pre-World War II apartment buildings, and have been identified under the thematic context of buildings erected by The George Washington University as well as the thematic context of government and institutional buildings. (See Exhibit W: Foggy Bottom Campus Historic Preservation Plan for a list of the additional proposed historic landmarks.)

3.4.2.3 Implementation of the Historic Preservation Plan

In addition to the general development guidelines set forth in the Campus Plan, the University has worked with OP's Historic Preservation staff to establish design guidelines for five identified development sites which are located adjacent or in close proximity to certain architecturally and/or historically significant buildings on the Foggy Bottom campus. These proposed design guidelines will further specify how the sites are proposed to be developed, including provisions for setbacks, parking and loading locations, as well as an acceptable range of exterior building materials. (See Exhibit W: Foggy Bottom Campus Historic Preservation Plan for specific design guidelines and affected development sites.) In addition, GW will continue to work with Historic Preservation staff to establish appropriate maintenance guidelines for already identified and potential historic landmarks as well as those buildings deemed contributing within the potential historic district.

The general approach and concept of the proposed Foggy Bottom Campus Historic Preservation Plan recently received favorable comment in its preliminary review by the DC Historic Preservation Review Board at its June 29, 2006 public meeting. The Plan will continue to be the subject of HPRB review over the next several months. GW and members of OP's Historic Preservation staff also plan to convene informational meetings with interested stakeholders, including members of the West End and Foggy Bottom communities and ANC 2A, during the summer of 2006. In the event the Zoning Commission acts favorably on the development plan set forth in the *Foggy Bottom Campus Plan: 2006 – 2025*, Historic Preservation Review Board hearings on the potential historic district and landmark applications would be initiated soon thereafter.

3.5 Open Spaces, Streetscape and Signage

The University is committed to maintaining and enhancing open spaces throughout the campus and recognizes the positive impact these unique places provide as a counterbalance to the urban campus environment. This philosophy underpins the University's development strategy to appropriately maximize the campus' vertical development potential and increase lot coverage in accordance with use, allowing for other areas of the campus to remain open and undeveloped (e.g., Kogan Plaza and the University Yard).

Campus open spaces are further enhanced and complemented by the campus pathway and pedestrian network. Opportunities to strengthen the network of pathways and create better connections between open spaces and various University uses were addressed in detail during the community-based planning process, and the resulting concepts have been specifically

incorporated into this Plan. (Exhibit L: Pathways & Open Spaces) Active open spaces and travel corridors create not only a more pedestrian-friendly campus environment, but can also enhance campus safety, promoting “positive surveillance” and reducing places where unviewed activities occur. Furthermore, the pathway and linkage network responds directly to concerns raised during the community-based planning process regarding the impact of student residence halls on private residential areas. For example, it is contemplated that the pathway network will create the opportunity for an additional means of access to the planned residence hall facility on Square 80 from G Street, providing an alternative (other than F Street) point of access to the building.

The pedestrian experience on the Foggy Bottom campus is of significant importance to the University, as it helps to create an attractive environment to study, live, and work. To this end, the University takes great efforts to maintain the campus environment and continues to develop streetscape improvements and enhancements. Standards regarding various streetscape components (including landscaping, street signage, lighting, and street furniture) are addressed in the Foggy Bottom Campus Streetscape Plan. A preliminary Streetscape Plan, developed in coordination with the Office of Planning and representatives from the DC Department of Transportation (DDOT), is included as Exhibit X. It is contemplated that the Streetscape Plan will be further refined and developed over the next several months through continued collaboration between the University, OP, and DDOT, and with the participation and input of interested stakeholders. To that end, an open community meeting focused specifically on the Streetscape Plan will be convened later this summer to gather additional community input and feedback on the concepts presented in this preliminary Plan. Ultimately, it is intended that the Streetscape Plan will serve as a comprehensive planning resource to complement the development plan set forth in the *Foggy Bottom Campus Plan: 2006 – 2025* as well as the Foggy Bottom Campus Historic Preservation Plan.

3.6 Parking

This Campus Plan does not call for any increases to student, faculty, or staff populations; accordingly, no modifications to the minimum parking requirement of 2,800 spaces or the general parking aggregation guidelines set forth in the existing Campus Plan are proposed.

While the Plan notes several sites which could accommodate underground parking facilities, not all of the sites would need to be developed to capacity in order to maintain the appropriate campus parking capacity and continue to meet the 2,800 space requirement. (Exhibit M: Parking Sites) The identification of numerous potential sites in this Plan allows the University to meet the parking needs of the campus while providing the flexibility necessary, given the long-term nature of this Plan, to accommodate various options for the sequencing of development sites. In order to ensure that campus parking capacity is not over-developed, an appropriate maximum cap on parking capacity could be implemented if deemed necessary by the Zoning Commission.

The Plan contemplates including University parking capacity on Square 54 and Square 122 for Campus Plan parking compliance purposes. Specifically, it is presently anticipated that up to one and one-half floors of parking (up to approximately 362 spaces) in the Square 54 redevelopment project will be dedicated for University use, and would therefore be included in the aggregated 2,800 parking space requirement. In addition, this Plan proposes that all of the parking capacity

in University facilities located on Square 122⁵ be counted toward the Campus Plan parking requirement.

The University will present and maintain a plan for continued compliance with the parking requirement throughout the duration of the Plan and will update the Commission as to its parking inventory at the time each second-stage application is filed. Depending on the timing and sequencing of various development projects – particularly with respect to the planned redevelopment of the University Parking Garage – the University may need to utilize, on an interim basis, certain off-campus parking resources to maintain compliance with the 2,800 space parking requirement.

SECTION 4: COMMITMENTS & CONDITIONS

This Campus Plan outlines a clear guide for development of the Foggy Bottom campus, which provides a level of predictability with respect to the location, density and use of future University development. Beyond the certainty afforded by the development plan itself, the University has agreed to make several commitments in response to community concerns voiced during the community-based planning process as well as issues raised by the Office of Planning. These commitments, together with the applicable conditions of the existing Campus Plan that will be updated and carried forward to the new Campus Plan (including the student enrollment and undergraduate student housing requirement), will provide a significant measure of control over future University growth and development and also improve Campus Plan compliance and enforcement mechanisms.

4.1 GW Commitments

At the conclusion of the series of co-sponsored community meetings, GW set forth its goals and commitments in connection with moving forward with the Campus Plan process and the proposed development plan for the Foggy Bottom campus. These goals and commitments included:

1. *Develop a plan for the future of the Foggy Bottom campus that accommodates GW's forecasted academic and student housing space needs within the existing Campus Plan boundaries and allows Square 54 to be developed as a mixed-use "town center."* The development plan set forth in this Campus Plan accomplishes this commitment by providing for over 1.5 million square feet of additional academic program space and approximately 1,000 additional student housing beds.²
2. *Establish a Community Advisory Committee to identify and address on-going community concerns.* GW has made significant efforts to strengthen the dialogue with the community and increase its responsiveness to community issues over the last several years, including establishing the Office of Foggy Bottom/West End Affairs. (Exhibit N: Community Affairs Initiatives) The University continues to actively seek to establish the Community Advisory Committee (specifically referenced in Condition 3 of the existing Campus Plan

⁵ Most of Square 122 is owned by the University and many, but not all, of the GW-owned properties are currently within the Campus Plan boundaries. Specifically, this Plan proposes that the parking lot and garage at the University's Old Main building (1922 F Street) be counted toward the Campus Plan parking requirement.

Order) as a forum to identify, discuss and resolve issues of mutual concern, and to continue the active dialogue that was initiated during the series of co-sponsored community meetings.

3. *Continue to Comply with the Campus Plan and establish effective Campus Plan compliance, monitoring and enforcement mechanisms.* The University has and continues to comply with the conditions set forth in the Campus Plan Order. GW is committed to working with the District and community stakeholders to resolve any and all questions regarding GW's record of, and continued commitment to, Campus Plan compliance, as well as to establish improved mechanisms to monitor and confirm Campus Plan compliance moving forward. Specifically, GW is seeking to establish Campus Plan reporting dates that align with standard University reporting dates (i.e., semester census), so as to ensure that reported data is consistent and can be easily confirmed and monitored by interested parties. The University has agreed to an independent audit of its reported Foggy Bottom student enrollment numbers to be conducted under the direction of the Zoning Administrator. The University has been assured by the Zoning Administrator and the Office of Planning that the results of the audit will be available well in advance of the Campus Plan hearings scheduled for September 2006.
4. *Future Use of Hall on Virginia Avenue and The Aston.* In addition to the planning and process-oriented commitments included above, GW also stated its intention to address key issues raised by the community, specifically those related to off-campus properties including identifying uses other than undergraduate student housing for the Hall on Virginia Avenue (located at 2601 Virginia Avenue) and The Aston (located at 1129 New Hampshire Avenue). These matters, including a timeline for the transition of undergraduate students from various off-campus housing facilities, are specifically addressed in the proposed Campus Plan conditions discussed below and included as Exhibit Y.

In addition to these goals and commitments set forth by the University, the Office of Planning proposed additional GW commitments aimed at minimizing objectionable impacts on the surrounding residential communities and improving Campus Plan compliance monitoring and enforcement. The University has agreed to comply with each of these additional commitments for the term of the Campus Plan, in the event the Plan is approved as submitted.

1. The University will agree (a) not to house undergraduate students in The Hall on Virginia Avenue after August 31, 2006 and (b) not to house undergraduate students in The Aston after August 31, 2007. (The University is currently evaluating future uses of these off-campus facilities, which could include graduate student or faculty and staff housing). As set forth more fully in the proposed Campus Plan conditions discussed below and included as Exhibit Y, the University has further agreed that (c) effective August 31, 2008, GW shall not house undergraduate students in units in Columbia Plaza for which GW maintains certain designation rights as part of GW's undergraduate student housing program (with the exception that juniors and seniors referred to Columbia Plaza as part of GW's student housing program prior to August 31, 2008, may continue to reside in their respective units, subject to the rules and guidelines associated with the GW student housing program, until they graduate from GW or are no longer

officially affiliated with the University), and (d) effective July 1, 2016, GW shall not house undergraduate students in City Hall.

2. The University will not purchase additional residentially-zoned properties outside of the Campus Plan boundaries in the Foggy Bottom/West End area (as defined in the existing Campus Plan Order) for university use. This commitment would not preclude the purchase of any properties for investment purposes; however, it would restrict the University from purchasing a residentially-zoned property within the above-defined area and changing its use to one limited to the GW population (e.g., a student residence hall).
3. The University will not initiate litigation challenging Zoning Commission action which approves the *Foggy Bottom Campus Plan: 2006 – 2025* as submitted by the University, so long as such approval is not contingent on conditions beyond those included in the existing Campus Plan Order as they are intended to be modified and updated as agreed upon by GW and the Office of Planning, or such other conditions to which GW later agrees.
4. The University will commit to maintain reasonable enrollment definitions and regular reporting and certification procedures as set forth in the proposed Campus Plan conditions (see Section 4.2 below).
5. GW will commit to maintain the existing minimum Campus Plan parking requirement, and in the event it is determined necessary, the University will also agree to establish an appropriate maximum parking capacity.

4.2 Campus Plan Conditions

It is contemplated that all of the applicable conditions imposed by the Board of Zoning Adjustment in connection with the existing Foggy Bottom Campus Plan will continue to be enforced with respect to this Campus Plan, including the student enrollment and undergraduate student housing requirements. The University and the Office of Planning have worked closely together to update the language of the existing conditions to appropriately reflect the changes in this Campus Plan and to ensure that the conditions are clear, well-defined, and reflect the appropriate level of specificity necessary to provide assurance of continued University compliance. Furthermore, at the direction of the Office of Planning, additional conditions have been added to address concerns raised by members of the Foggy Bottom and West End communities. These updated conditions were individually detailed in the Office of Planning's April 10, 2006 setdown report and are also included as Exhibit Y.

SECTION 5: ZONING PROCESS

GW has worked closely with the Office of Planning to identify the appropriate zoning mechanism to achieve the University's proposed development plan. The Office of Planning ultimately recommended that a new Campus Plan, coupled with the two-stage PUD process and a text amendment to the Campus Plan Regulations to permit an increase in aggregate FAR in R-5-D and R-5-E zones from 3.5 to 4.0, would provide an effective means to implement the University's "*Grow Up, Not Out*" strategy, while maintaining reasonable controls on future development. This approach accommodates GW's forecasted academic and student housing

needs on campus, allows a level of specificity and predictability that benefits all stakeholders, and provides the requisite flexibility inherent in any long-term plan. Filed in conjunction with the Campus Plan, the two-stage PUD views the campus as a whole, identifying a plan for development that reflects and enhances the unique and diverse urban character of the campus, maintains identified historic and architectural resources, preserves and enhances open spaces and pedestrian networks, and provides important public benefits to the Foggy Bottom and West End neighborhoods and the District.

5.1 New Campus Plan

While certain planning components and the substance of the applicable conditions from the existing Campus Plan are contemplated to be maintained, the nature and scope of the changes in the proposed development plan detailed in Section 3 warranted filing a new Campus Plan, as opposed to amending the existing Plan. The term of this Campus Plan will commence immediately upon Zoning Commission approval and is proposed to extend through June 30, 2025.

5.2 Two-Stage PUD

The two-stage PUD process involves a first-stage application, filed concurrently and in conjunction with this Campus Plan. The first-stage application includes the entire campus and identifies the specific development sites detailed in this Plan as second-stage PUD projects. Through the PUD planning mechanism, density will be appropriately targeted on specific development sites, primarily located in the campus core. In order to achieve the necessary height and density on these specific sites, the underlying zoning of each site is proposed to be changed to C-3-C. This zoning change will also allow for the development of neighborhood-serving retail on campus, specifically the proposed I Street Retail Corridor extending from the I Street Mall at the Foggy Bottom-GWU Metro station to The Shops at 2000 Penn. (Exhibit H: I Street Retail Corridor) In addition, one site on Pennsylvania Avenue (site 75A) is proposed to be rezoned from C-3-C to C-4 to accommodate the contemplated density of the site which is appropriate given its location on a major commercial corridor and its infill nature.⁶ The underlying residential zoning of the remainder of campus, specifically those areas adjacent to the existing residential communities to the west and south of campus and the development sites included in those areas, will remain unchanged. (Exhibit O: Proposed Zoning)

The public benefits required to justify the zoning flexibility under the PUD process include:

- Facilitating the accommodation of the University's forecasted academic and student housing space requirements within the existing Campus Plan boundaries (the "*Grow Up, Not Out*" approach underlying this updated Campus Plan);
- Concentrating growth within the campus core, with fewer development sites on the periphery of campus near existing residential neighborhoods;
- Increasing retail services to serve the Foggy Bottom and West End neighborhoods as well as the University community;

⁶ The consolidated PUD applications for Square 54 and site 80A requested rezoning of each of those sites to C-3-C and SP-2, respectively.

- Preserving and maintaining numerous buildings of architectural and historic significance on the Foggy Bottom campus through a comprehensive Historic Preservation Plan, including the creation of a potential campus historic district and the proposed landmark designation of several additional buildings on campus;
- GW commitment to transition various off-campus properties to uses other than undergraduate student housing as detailed more fully in the proposed Campus Plan conditions; and
- GW commitment not to purchase additional residentially-zoned properties outside of the Campus Plan boundaries in the Foggy Bottom/West End neighborhoods for other than investment purposes.

The first-stage PUD will have a proposed term of twenty (20) years consistent with the term of the Campus Plan. Pursuant to section 2407.10 and 2407.11 of the Zoning Regulations, the Zoning Commission has the authority to specify a twenty-year time period for a first-stage PUD and to provide that the rights and conditions associated with the PUD shall remain in effect for the duration of the full term. Each development project identified in the PUD would require approval through a second-stage PUD process, including a detailed site plan review to confirm compliance with the first-stage approval. It is anticipated that the second-stage review process would also incorporate the further processing review that would continue to be required with respect to residentially-zoned properties under the existing Campus Plan regulations.

5.3 Text Amendment

In order to achieve the overall development rights necessary to achieve this Plan, the Office of Planning has initiated a text amendment to the Campus Plan Zoning Regulations which would increase the aggregated FAR limitation from 3.5 to 4.0 in R-5-D and R-5-E zones located within approved campus plans. This increase, coupled with the proposed commercial rezoning of certain sites in the campus core, will allow the University to accommodate its academic and student housing space needs on campus while still maintaining an overall campus density that is appropriate and in context with the surrounding built environment.

SECTION 6: COMPLIANCE WITH PROVISIONS OF CAMPUS PLAN REGULATIONS (DCMR SECTION 210)

As set forth below, The *Foggy Bottom Campus Plan: 2006 – 2025* specifically complies in the following respects with Section 210 of the District of Columbia Zoning Regulations:

6.1 College or University Which is an Academic Institution of Higher Learning (Sub-section 210.1)

The George Washington University was chartered as an educational institution of higher learning by act of Congress dated February 9, 1821. (Exhibit C: University Charter)

6.2 The Use is Located So That it is Not Likely to Become Objectionable to Neighboring Property (Sub-section 210.2)

1. Noise. Activities within the Campus Plan boundaries are located and designed so as to minimize objectionable impacts on the neighboring community. Specifically, new

facilities proposed in this Campus Plan are focused primarily in the campus core, internal to the campus and away from surrounding residential neighborhoods, which will minimize impact on the surrounding community in terms of noise. In the continuing effort to control and reduce objectionable noise, the University will work to:

- locate campus activities to address the needs of students, staff and faculty for appropriately quiet and secure places to study, work and live, as well as with attention to the need to minimize objectionable impacts on the neighboring community;
- locate and improve pathways internal to campus to provide pedestrian alternatives to the existing street network;
- locate and design loading docks and mechanical systems to reduce, to the extent reasonably possible, the noise they produce; and
- continue to transition off-campus properties to uses other than undergraduate student housing which could have the result of reducing noise in the surrounding neighborhoods.

2. **Traffic.** The University encourages the use of public transportation by all members of the GW community, while recognizing that not everyone has convenient access to public transportation and that some students, staff and visitors must drive to campus. Traffic consultants from Wells & Associates, LLC have prepared a detailed traffic study evaluating the impacts of the development plan proposed in this Campus Plan. (Exhibit P: Traffic & Parking Report)

3. **Population.** The development proposed in this Campus Plan will not create objectionable conditions due to the number of students, faculty, or staff. In fact, the University does not seek to increase the overall population standards established under the existing Campus Plan, which are currently set forth as:

- Foggy Bottom student⁷ enrollment: 20,000 headcount and 16,553 full-time equivalent
- Foggy Bottom faculty and staff⁸: 12,529 headcount and 10,550 full-time equivalent

6.3 Compliance with the Maximum Bulk Requirements (Sub-section 210.3)

The property within the Campus Plan boundaries is zoned R-5-D, R-5-E, SP-2, and C-3-C. (Exhibit R: Existing Zoning) Certain sites identified in this Campus Plan and the accompanying campus PUD application are proposed to be rezoned C-3-C and one site on Pennsylvania Avenue is proposed to be rezoned C-4. (Exhibit O: Proposed Zoning) The Zoning Regulations currently limit campus development in R-5-D and R-5-E zones to an aggregated 3.5 FAR. At the time of the filing of this Campus Plan, the Office of Planning initiated a text amendment to the Zoning Regulations which would increase the aggregated FAR from 3.5 to 4.0 in R-5-D and R-5-E zones within approved campus plans. The maximum permitted FAR for buildings within the SP-2 district is 6.0 (6.5 under a PUD); the maximum permitted FAR for buildings within the C-3-C district is 6.5 (8.0 under a PUD); and the maximum permitted FAR for buildings within the C-4 district is 10.0 (10.5 under a PUD).

⁷ The current methodology for defining “Foggy Bottom student” is detailed in Exhibit Q: Enrollment Methodology. The proposed methodology for defining “Foggy Bottom student” is included in Exhibit Y: Proposed Campus Plan Conditions.

⁸ The proposed methodology for defining “Foggy Bottom faculty and staff” is included in Exhibit Y: Proposed Campus Plan Conditions.

When added to all existing buildings and structures on campus, development under this Campus Plan will not exceed the proposed aggregated FAR limits for the residentially-zoned areas of campus (as proposed to be amended), and development contemplated for each SP and commercially-zoned site will not exceed its maximum permitted FAR. If all proposed development is constructed, the gross floor area within the Campus Plan boundaries will total approximately 7,402,231⁹ square feet in all zones, with a projected 3,868,182⁶ square feet of gross floor area within those areas proposed to remain residentially-zoned. This results in an overall FAR, within residentially-zoned areas, of 3.69¹⁰. (Exhibit S: Existing Conditions and Exhibit T: Space Summary)

6.4 Submission of a Plan for Developing the Campus as a Whole (Sub-section 210.4)

1. Buildings, Parking, and Loading Facilities

a. Buildings. The development plan detailed in this Campus Plan calls for new development to accommodate the University's forecasted academic and student housing space needs detailed in Exhibit J: Development Program Summary and summarized below:

- Academic/Administrative/Medical: 1,332,047 square feet of gross floor area (GFA)¹¹
- Residential/Campus Life/Athletic: 346,488 square feet of gross floor area (GFA)
- Commercial/Investment: 109,710 square feet of gross floor area (GFA)

b. Parking. GW's current parking inventory includes a capacity of 3,467 on-campus off-street parking spaces, in compliance with the Campus Plan condition that requires the University maintain a minimum of 2,800 off-street parking spaces. As this Campus Plan does not call for any increases to maximum student, faculty, or staff population standards, no modifications to the minimum parking requirement of 2,800 spaces or the general aggregation guidelines set forth in the existing Campus Plan are contemplated.

As detailed more fully in Section 3.6, while the Plan notes several sites which could accommodate underground parking facilities, not all of them would need or are intended to be developed to capacity in order to maintain the appropriate campus parking capacity and continue to meet the 2,800 space requirement. The identification of numerous potential sites in this Plan allows for the University to meet the parking needs of the campus, while providing the flexibility necessary given the long-term nature of this Plan and the timing of site development.

⁹ These calculations exclude both the land area and developments (GFA) for Square 54 and Site 80A, as these projects will be addressed under separate zoning processes.

¹⁰ The 3.69 FAR calculation includes only University-owned land area and developments (GFA) included in the development plan that are contemplated to remain residentially-zoned. The calculation does not include University-owned properties included in the development sites proposed to be rezoned C-3-C under the Foggy Bottom Campus PUD nor does it include land area and developments (GFA) for Square 54 and Site 80A, as these projects are proposed to be zoned C-3-C and SP-2, respectively.

¹¹ **The academic program space yielded by this development program totals 1,665,651 GFA.** This differs from the new development GFA reported in the Academic/Administrative/Medical category above because the new GFA figure reflects the demolition of the existing above-grade University Parking Garage (333,604 GFA). The University Parking Garage does not provide academic program space, although its GFA is currently counted in the Academic/Administrative/Medical category.

In order to ensure that campus parking capacity is not over-developed, an appropriate maximum cap on parking capacity could be implemented. (Exhibit M: Parking Sites)

The University will present and maintain a plan for continued compliance with the parking requirement during the phased development of the various sites (including the University Parking Garage) set forth in this Plan.

c. Loading. Many of the University's general deliveries take place at the Support Building at 2025 F Street, while certain special deliveries occur at loading docks and departments located throughout the campus, as detailed more fully in Exhibit P: Traffic & Parking Report.

2. Screening, Signs, Streets, Public Utility Facilities (Sub-section 210.5). The University takes great efforts to maintain an attractive campus environment and continues to develop streetscape improvements and enhancements. Standards regarding various streetscape components will be addressed in the Foggy Bottom Campus Streetscape Plan. A preliminary Streetscape Plan, developed in collaboration with the Office of Planning and representatives from the DC Department of Transportation (DDOT), is included as Exhibit X.

The Foggy Bottom campus is currently served by all major utilities. The increased use of public utility services that will occur as a result of the implementation of this Campus Plan will have an inconsequential effect on the District's delivery systems. No special utility development conditions are expected to be required in connection with this Campus Plan.

3. Athletic and Other Recreational Facilities. Recent campus development projects, including the Health and Wellness Center, Marvin Center addition, Kogan Plaza, and improvements to the University Yard have significantly enhanced the athletic and recreational opportunities on campus. Other University athletic and recreational facilities include the Smith Center, as well as numerous facilities (including NCAA soccer and softball fields, a pool, and six outdoor tennis courts) located at the University's Mount Vernon Campus. As part of this Campus Plan, an addition to the Marvin Center (above the existing Betts Theatre) is contemplated to address the growing demand for student activity and support space.

4. Description of All Activities and of Capacity of All Present and Proposed Campus Development. The activities to be conducted on campus include those activities associated with general university use as well as auxiliary uses and are consistent with the activities included in the existing Campus Plan. (Exhibit U: Existing Uses and Exhibit V: Proposed Uses) Furthermore, the implementation of the development plan proposed in this Campus Plan would create a unique and dynamic retail corridor along I Street, providing key campus and neighborhood-serving retail services, and would allow the Square 54 site to be redeveloped as mixed use "town center" (including market-rate residential, office, community space and retail uses), achieving shared benefits for the Community, the District, and the University. (Exhibit H: I Street Retail Corridor)

6.5 No Interim Use of Land is Proposed (Sub-section 210.5)

No interim use of residentially-zoned land is specifically requested as part of this Campus Plan.¹²

6.6 No New Use Sought for Approved Site of Buildings Moved Off-Campus (Sub-section 210.6)

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

6.7 Compliance with the Policies of the District Elements of the Comprehensive Plan (Sub-section 210.7)

This Campus Plan complies with the policies of the District Elements of the Comprehensive Plan. Specifically, the Plan fulfills numerous objectives of the Economic Development Element of the Comprehensive Plan. The University is a major source of jobs, a major consumer of goods and services supplied by local vendors, and a major generator of retail sales and service goods for a diverse and widely distributed group of businesses. Specifically, the proposed I Street retail corridor and commercial redevelopment of Square 54 contemplated under this Campus Plan would have a significant and lasting positive economic impact on the District. (Exhibit H: I Street Retail Corridor)

Additionally, the development plan set forth in this Campus Plan will fulfill goals of the Comprehensive Plan pertaining to architectural character, streetscapes, sidewalks, and urban parks and places. The development plan calls for the maintenance of many existing historic and architectural resources on campus, and a comprehensive Foggy Bottom Campus Historic Preservation Plan for identifying and preserving these resources has been developed in conjunction with the Office of Planning (Exhibit W: Foggy Bottom Campus Historic Preservation Plan). The development plan consolidates density and development, particularly in areas close to public transit, in order to provide open spaces and incorporate pathways to increase pedestrian connections. Standards regarding various streetscape components will be addressed in the Foggy Bottom Campus Streetscape Plan. A preliminary Streetscape Plan, developed in collaboration with the Office of Planning and representatives from the DC Department of Transportation (DDOT), is included as Exhibit X.

Finally, consistent with the campus' inclusion in the institutional land use category of the Comprehensive Plan, this Plan specifically calls for the development of facilities to offer unique opportunities for learning, teaching, and research. Modernized labs, classrooms with integrated technology and spaces to accommodate GW's unique cross-disciplinary research and academic programs will be developed under this Plan.

6.8 Proposed Buildings are Within the Floor Area Limit for the Campus as a Whole (Sub-section 210.8)

¹² While no interim use of residentially-zoned land is specifically proposed as part of this Campus Plan, depending on the timing and sequencing of the proposed development projects – particularly with respect to the planned redevelopment of the University Parking Garage – the University may need to utilize, on an interim basis, certain off-campus parking resources to maintain compliance with the 2,800 space parking requirement. If such interim parking use is required, it will be specifically raised and addressed in connection with the relevant review process associated with the project requiring the interim parking use.

When added to all existing buildings and structures on campus, development under this Campus Plan will not exceed the proposed aggregated FAR limits for the residentially-zoned areas of campus (as proposed to be amended), and development contemplated for each SP and commercially-zoned site will not exceed its maximum permitted FAR. If all development proposed pursuant to this Campus Plan and accompanying First-Stage PUD is constructed, the gross floor area within the Campus Plan boundaries will total approximately 7,402,231⁶ square feet, with a projected 3,868,182⁶ square feet of gross floor area within those areas proposed to remain residentially-zoned. This results in an overall FAR, within residentially-zoned areas, of 3.69.⁷ If all development proposed pursuant to this Campus Plan and accompanying First-Stage PUD, as well as the proposed development of Square 54 and Square 80 pursuant to the consolidated PUD application filed for each site is constructed, the gross floor area within the Campus Plan boundaries will total approximately 8,452,519⁶, with a projected 3,868,182⁶ square feet of gross floor area within those areas proposed to remain residentially-zoned. This results in an overall FAR, including *all* zones within the Campus Plan boundaries, of slightly under 5.00. (Exhibit S: Existing Conditions and Exhibit T: Space Summary)

6.9 Referral to the District of Columbia Office of Planning and the District of Columbia Department of Transportation (Sub-section 210.9)

This Campus Plan application has been referred to the District of Columbia Office of Planning (OP) and the District of Columbia Department of Transportation (DDOT) for their review and report.