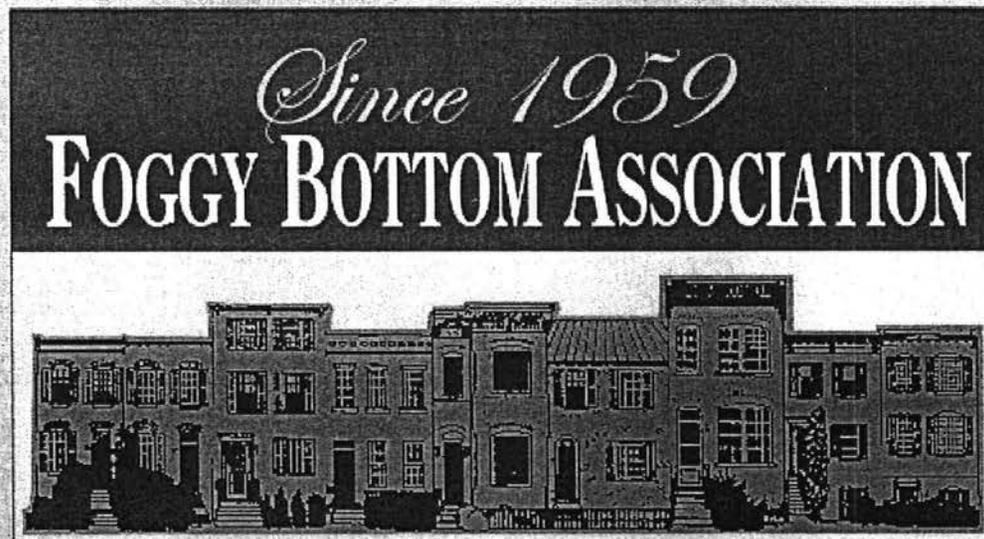


# George Washington University Campus Plan 2006-2025 and PUD Applications

ZONING COMMISSION  
District of Columbia

CASE NO. 06-12

EXHIBIT NO. 165



## Testimony of the Foggy Bottom Association September 25, 2006

ZONING COMMISSION  
District of Columbia

CASE NO. 06-12<sup>1</sup>

EXHIBIT NO. 165

ZONING COMMISSION  
District of Columbia  
CASE NO.06-12  
EXHIBIT NO.165

# Why are we here?

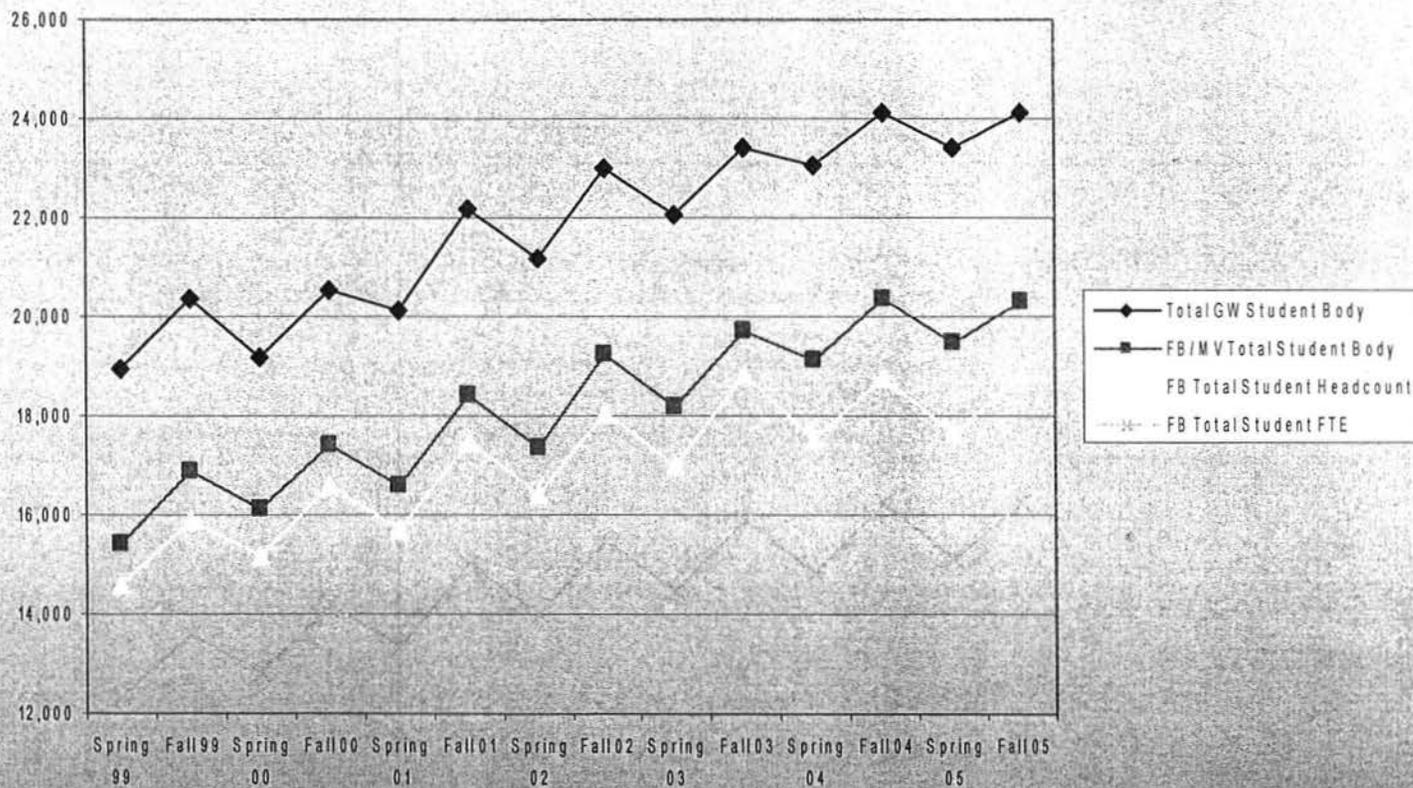
- No good reason to discard valid 2000 Plan.
  - Some steps taken to identify the problems identified in 2000 in terms of housing, noise, student behavior, etc.
  - Enforcement remains the key problem.
  - GWU has shown no compelling need to change timetable. Proposed 20-year period dubious.
    - Only 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.

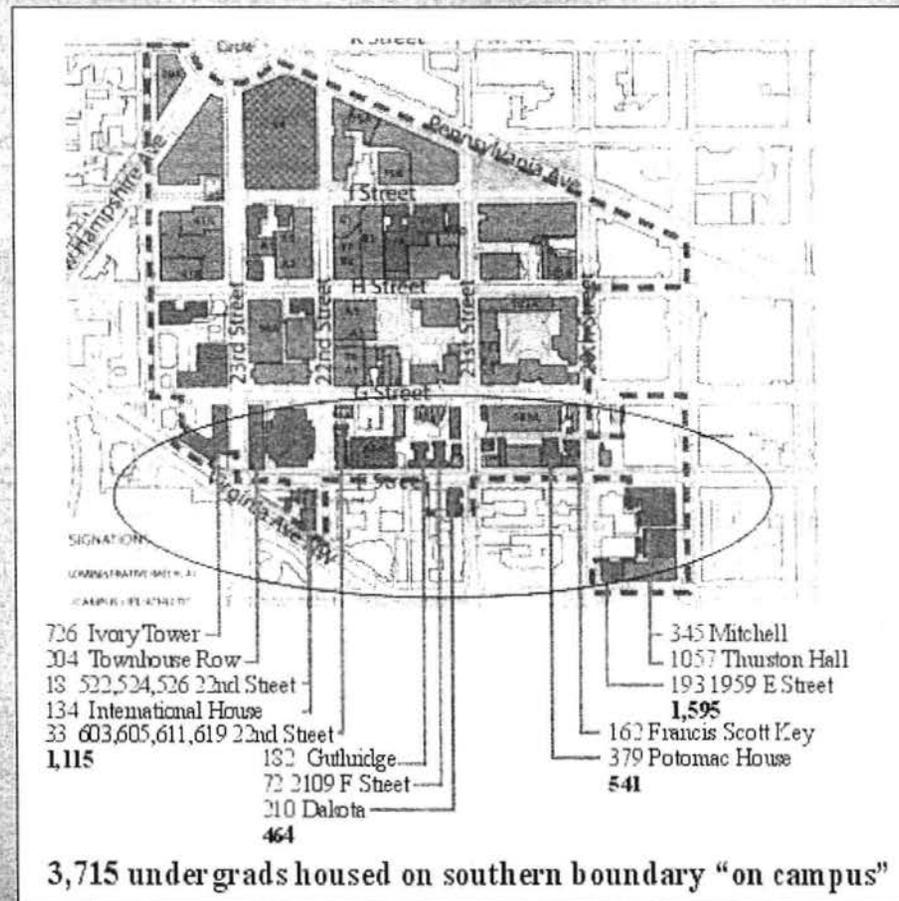
# Campus Plan criteria not met

- 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

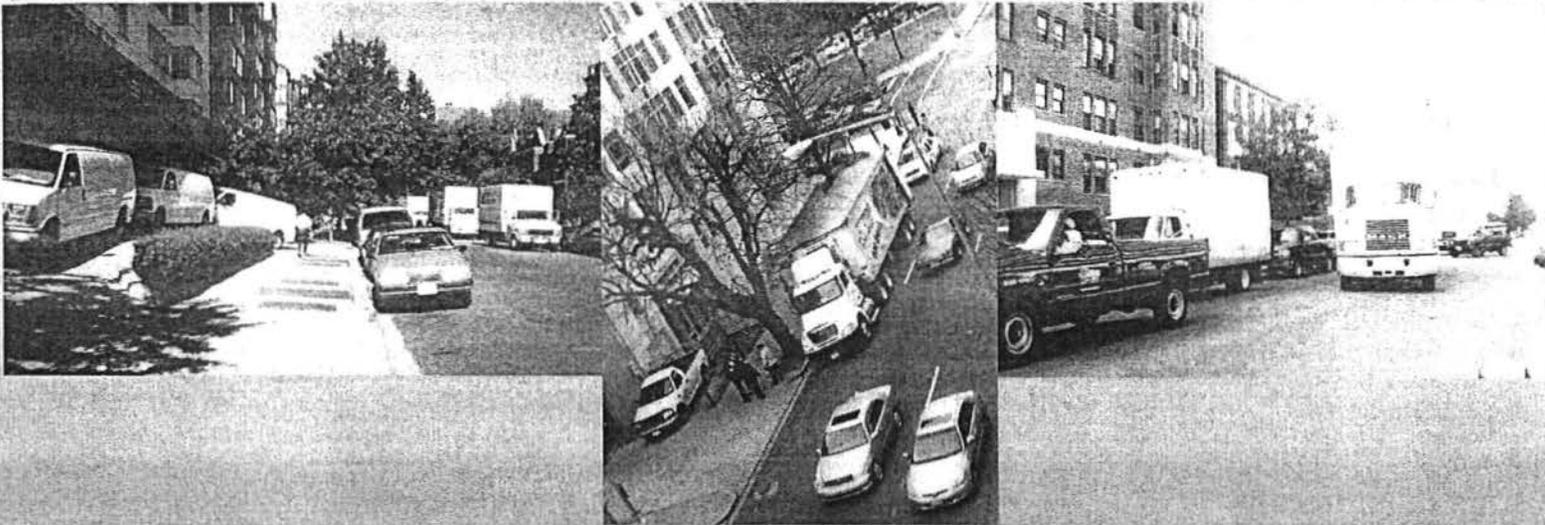
- Adding 1,700,000 sq. ft. will exacerbate existing adverse conditions.
- OP report does not examine over-development.
- No study of trip generation for the new 1,700,000 sq. ft.
- 3.65 FAR proposal for a currently zoned residential area exceeds maximum allowed under § 210.
- Rezoning to C-3-C “circumvents” § 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: 21<sup>st</sup> 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.

