

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
OFFICE OF PLANNING



RECEIVED

D.C. OFFICE OF ZONING

2006 SEP - 5 PM 4: 17

Office of the Director

**Memorandum**

**TO:** District of Columbia Zoning Commission

**FROM:** *JLS Del*  
Ellen McCarthy, Director  
Office of Planning

**DATE:** September 5, 2006

**SUBJECT:** Final Report for George Washington University Campus Plan 2006-2025 ZC #06-11 and related first-stage PUD and map amendment - ZC #06-12.

**APPLICATION**

The George Washington University has petitioned the Zoning Commission for approval of a new twenty year campus plan. Future developments on the George Washington University campus would be subject to a first-stage PUD filed in conjunction with the campus plan. All subsequent development (i.e. further processing) on the campus for the life of the plan will be filed as second-stage PUDs subject to the plan and first-stage PUD. While filed under separate application numbers, the PUD is dependent upon the campus plan and the two will be heard together.

**SUMMARY RECOMMENDATION**

OP has continued to work with GWU and the surrounding community on the specifics of this plan. OP recommends that the applications be approved subject to the conditions set forth in this report.

**DESCRIPTION OF THE CAMPUS AND SURROUNDING AREA**

The GW campus is located in northwest Washington between 19<sup>th</sup> Street on the east, 24<sup>th</sup> Street on the west, E Street to the south and Pennsylvania Avenue to the north. First relocated to the area in 1912, the campus saw its largest growth in the 1920s, 30s, and 40s with many of its existing buildings constructed during this time period. The present campus boundaries were established through the campus plan process in 2001.

The campus sits at the east end of the historic Foggy Bottom neighborhood, an area characterized by late nineteenth century two-story townhouses and early twentieth century mid-rise apartment buildings. To the east of campus are several international financial institution buildings, including buildings for World Bank and the International Monetary Fund. Across Pennsylvania Avenue to the northeast is the Golden Triangle business district. Across Washington Circle to the northwest of campus is the West End neighborhood. Finally, to the south of GW is an area of federal buildings known as the Northwest Rectangle.

ZONING COMMISSION  
District of Columbia

CASE NO. *06-12*  
ZONING COMMISSION  
District of Columbia  
CASE NO. 06-12  
EXHIBIT NO. *312*  
EXHIBIT NO. 36

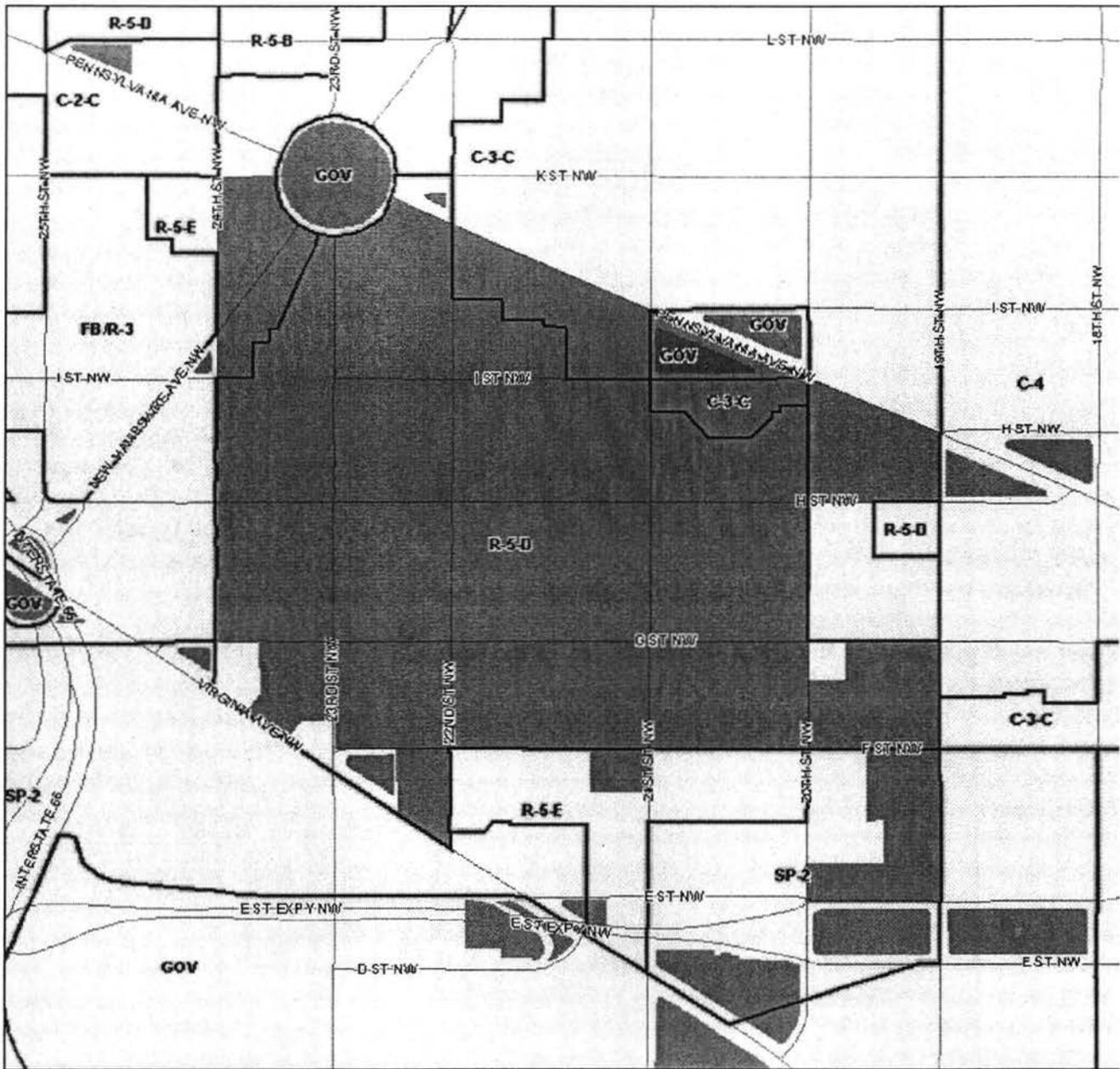


Figure 1: Existing Zoning

## BACKGROUND

GW approached the Office of Planning in late 2004 to discuss the possibility of developing the old hospital site (Square 54) for investment purposes. At that time, OP made clear to GW that we would not support any non-academic uses on Square 54 without a detailed plan showing that GW's academic needs could be met on the remainder of campus. It was suggested that GW begin a process of meeting with community members. In March 2005, a negotiated planning process was attempted between GW, OP, ANC 2A, and the Foggy Bottom Association (FBA). The mediated negotiation process was abandoned when the FBA withdrew before sides could reach agreement on meeting terms.

In early May of 2005, GW and OP cosponsored an Urban Land Institute Panel to examine the redevelopment of Square 54. The panel interviewed stakeholders including representatives of the university, the Foggy Bottom and West End neighborhoods, the business community, and the city government. The panel concluded that a mix of commercial and residential development was the best future use for the site, *provided* that GW could meet its future academic needs within the existing campus boundaries.

In June 2005, GW, OP, and ANC 2A began a series of community meetings to discuss Square 54 and the campus development plan. Four meetings were held between June and September of last year in which the public was given the opportunity to review and comment on iterations of GW's proposed development plan. In November 2005, the ANC passed a resolution withdrawing itself from further discussion on the plan.

Between September 2005 and March 2006, OP continued to review GW's proposed development plan and offer comments and suggestions. The plan was setdown by the Zoning Commission on April 20, 2006 for public hearing.

The plan presented at the setdown meeting and as amended since is vastly changed from the original concepts and reflects changes based on community, professional, and government comments. OP believes that the proposed plan reflects GW's best effort yet to create a detailed long-term development plan for its campus, contribute to an open, transparent process, and work to address community concerns straight-forwardly and for mutual benefit.

### **PROPOSED PLAN SUMMARY**

The proposal submitted by GW for consideration would replace the existing plan in its entirety. It is intended that all aspects of the existing plan that are still relevant would be brought forward into the new plan. The new plan incorporates several elements, each of which are summarized here and discussed in detail later in the report.

#### *Historic Preservation*

First, through work with OP Historic Preservation staff, GW has identified sites and areas on campus that are worthy of historic protection. GW has presented to the Historic Preservation Review Board a proposed historic district. Subject to approval of the new plan, GW has committed to complete the process of historic district designation with the HPRB.

#### *Development Plan*

Second, based on meetings with OP and the community, GW has created a development plan that reflects 1) the space needs of the university, 2) the height and massing concerns of neighboring properties to the west and south of campus, 3) the historic resources identified above, and 4) the appropriate type and density of proposed development sites based on all factors. The main themes that have arisen from the process have been minimizing height and bulk at the periphery of campus, concentrating density along 22<sup>nd</sup> Street in the center of campus, recognizing and planning for green space and pedestrian corridors, and identifying and reinforcing the character of the various campus streets.

### *Conditions of Approval*

Third, the GW commitments on the attached list are intended to be conditions of approval. All relevant conditions from the previous campus plan order have been carried forward. Further, several new commitments have been agreed to by GW in discussion with OP. Significant new commitments include, removal of all undergraduate students from off-campus housing, an agreement not to purchase Foggy Bottom/West End residential property for university use, limitation of development to identified sites, regular audits of enrollment numbers, agreement not to challenge commitments in court, and agreement to abide by the plan for a twenty-year time period.

### *Planned Unit Development*

Fourth, the process agreed to by the University at the request of the Office of Planning requires the submission of a campus-wide first stage Planned Unit Development, and the submission of individual second stage PUD applications for each identified development project in the campus plan. This process accomplishes several goals as outlined later in this report including providing the Zoning Commission with design control over future GW projects, providing flexibility in building design, limiting both location and mechanisms for future development projects, and providing both the university and the community with comfort as to what buildings can be located where over the next twenty years.

Finally, the plan recognizes that there is a limit in both the student enrollment and building density that this historic area can reasonably accommodate. OP, GW, and the community have all agreed that the existing enrollment cap should not be changed or exceeded. This is reflected in the new plan. In addition, the campus has a limit on the amount of building density it can support based on existing structures and surrounding uses. GW, in consultation with OP and the community, has made an effort to define where density is appropriate through the proposed development plan. While this plan goes above and beyond the zoning regulation requirements for campus plans in terms of identifying and limiting development, the total FAR in residentially zoned properties will exceed the currently allowed 3.5. In addition, the total density on campus, including commercially zoned properties, will be close to 5.0. In light of the level of detailed planning that has gone into the plan and the restrictions on development and growth, OP recommends that additional density be granted on identified development sites through the PUD process. This will include PUD related map amendments for several sites in the center of campus along 22<sup>nd</sup> Street.

These aspects are described and explained in more detail below.

## **HISTORIC RESOURCES**

Foggy Bottom and the West End first developed as a prestigious residential area near the White House. From the establishment of the city, Pennsylvania Avenue was the main artery connecting the capital to Georgetown, and it was also the location of the city's first streetcar line, established during the Civil War. Because of the proximity to the White House and this transportation artery, the northern and eastern sides of the neighborhood were among the first areas of the city to develop. Toward the west and south, development was slower and more oriented to mercantile and manufacturing uses because of proximity to the old canal and waterfront, and because the low-lying land was less desirable.

A few large pre-Civil war houses still remain in the neighborhood today, and several of these are designated historic landmarks. As the neighborhood developed through the 19<sup>th</sup> century, it gradually filled in with mostly rowhouses on the side streets and commercial buildings along Pennsylvania Avenue. Churches and schools were scattered through the neighborhoods. Most of this Victorian era

development has disappeared, but there are still a few blocks that remain from this period, such as the 2100 block of G Street or the 700 block of 22<sup>nd</sup> Street, NW.

By the early 20<sup>th</sup> century, new and larger buildings arrived in this area as the commercial and government core of the city expanded and apartment buildings became common in inner-city neighborhoods. Large government and institutional offices such as the Winder Building were first located near the White House and Executive Office Building, but they gradually proliferated to fill virtually the entire area south of E Street. During the 1920s and 1930s, tall apartment buildings and apartment-hotels became common throughout the neighborhood, many located on prime corner sites. About a dozen of these apartments remain today, many converted to dormitory use.

George Washington University became a presence in the neighborhood by 1912, when it occupied a building at 2023 G Street, NW. During the following decades, GWU gradually expanded first by converting older buildings to academic use, and then by constructing its own new facilities. Several of these early GWU buildings, both converted and purpose-built, are designated historic landmarks. The university continued to grow and build after World War II, as institutional and commercial offices also expanded along Pennsylvania Avenue. Today, most of the neighborhood is dominated by these modern structures, although many older structures and a number of intact older blocks remain to document the history of the neighborhood. Part of the area appears to qualify for designation as a historic district reflecting all phases of neighborhood history, and other properties appear eligible for historic landmark designation.

The GWU campus includes both designated and eligible historic properties. Within the campus plan boundaries there are 12 existing historic landmarks, including Red Lion Row, the D.C. Fire House (Engine Company 23) and 10 other buildings owned by the university. These landmarks include pre-Civil War houses like Woodhull House and the Alumni House, Victorian rowhouses that have been converted for academic use (including the Oscar Underwood house, a National Historic Landmark), the first classroom and dormitory buildings constructed by the university starting in the 1920s, and the World War II-era Lisner Auditorium.

The potential historic district includes several blocks of the campus where there are largely intact streetscapes of Victorian rowhouses intermixed with taller early-20<sup>th</sup> century apartment houses. This historic character is most evident in the southern part of the campus along 20<sup>th</sup>, 21<sup>st</sup>, 22<sup>nd</sup>, F, and G streets, which retain the rich visual character of a historic residential neighborhood. In the middle of the campus, the potential district also includes the original university quadrangle and older campus buildings dating from the mid-1920s to the early-1950s. These buildings document the history of the university as it established a campus presence in the neighborhood and gradually formulated its institutional image. They reflect a transition from a traditional Colonial Revival style to a more contemporary Art Moderne or International style expression as the university grew. Completing the eligible district are two churches, the Ulysses Grant School (School Without Walls) built in 1882, the former St. John's Orphanage built in 1914, and several apartment buildings beyond the campus boundary.

In addition to these proposed historic district, GW has agreed to file landmark applications for seven properties on campus. At 2131-33 G Street is the original office and studio of John Joseph Earley, a nationally significant craftsman who pioneered the development of polychrome architectural concrete. Earley's work in Washington includes Meridian Hill Park, Franciscan Monastery, Sacred Heart Church,

and other historic landmarks. The Spanish Revival United Methodist Episcopal Church at 814 20<sup>th</sup> Street is significant for its historical associations and architectural style. About half of the 1920s and 1930s apartment buildings now used as GWU dormitories are outside the boundaries of the potential historic district but are included in the landmark designation.

GW has presented its plan to the Historic Preservation Review Board at two informational sessions on June 29 and July 27 of this year. At these meetings, historic preservation staff commended the university for its work on the plan, endorsed the process that created the plan, and encouraged OP to use this district as a model for future campus plans. Upon final approval of the campus plan, GW will file the landmark applications listed in the plan while Historic Preservation staff of the Office of Planning will file the application for the historic district.

### **DEVELOPMENT PLAN**

Section 210.4 of the zoning regulations requires a development plan for the campus showing buildings and campus facilities. The existing plan provides general guidance for new development in terms of use and sites, but does not take the larger step of defining where height and bulk are appropriate on the campus and where the existing density and buildings should be maintained. One of the main purposes of the new plan is to define the future development. The evolution of the proposed development plan involved a thorough review of available campus infill sites, surrounding zoning, surrounding uses, surrounding density, existing campus uses and density, as well as the historic resources above. All of these factors led to changes from the original plan that shows full development on all open campus sites, to the proposed plan that reflects the reality of the existing situation, the effects on campus neighbors, and the needs of the university.

The main theme resulting from the planning process that affected the development plan was the idea that additional height and density were not appropriate on the south and west portions of campus and should be limited to the core of campus along the 22<sup>nd</sup> Street corridor. This led to changes in the development plan that removed development sites along the peripheries of campus and added infill sites around the intersections at 22<sup>nd</sup> & H and 22<sup>nd</sup> & I Streets. This single concept accomplishes multiple city and community goals. It protects the historic view corridor along 23<sup>rd</sup> Street. It limits impacts of development on the historic Foggy Bottom area west of campus; there will only be one new building west of 23<sup>rd</sup> Street and infill of unused space on square 41. The historic G Street corridor will be preserved largely intact, with only two new buildings designed with heights and densities that complement the surrounding historic fabric. This will also serve to limit the impacts on residential uses south of campus. Historic buildings on Square 102 will be enhanced with infill rather than overshadowed. The contemplated retail corridor along I Street can be fulfilled. Finally, the bulk of new GW square footage can be gained by more efficient development on central campus rather than bulky new buildings throughout the campus area.

One of the most significant achievements of this plan is that, because of the comprehensive level of planning that has occurred, GW can commit to the city and the neighborhood that no development will take place outside of the proposed sites. The previous plan allowed further processing applications, which meant that developments not identified on the plan but in general consistency with the plan could be submitted by the University. The proposal with this plan would be for the university to limit all new development on campus to the sites identified on the development plan at the heights and densities agreed to. This aspect is further discussed in the PUD section of this report.

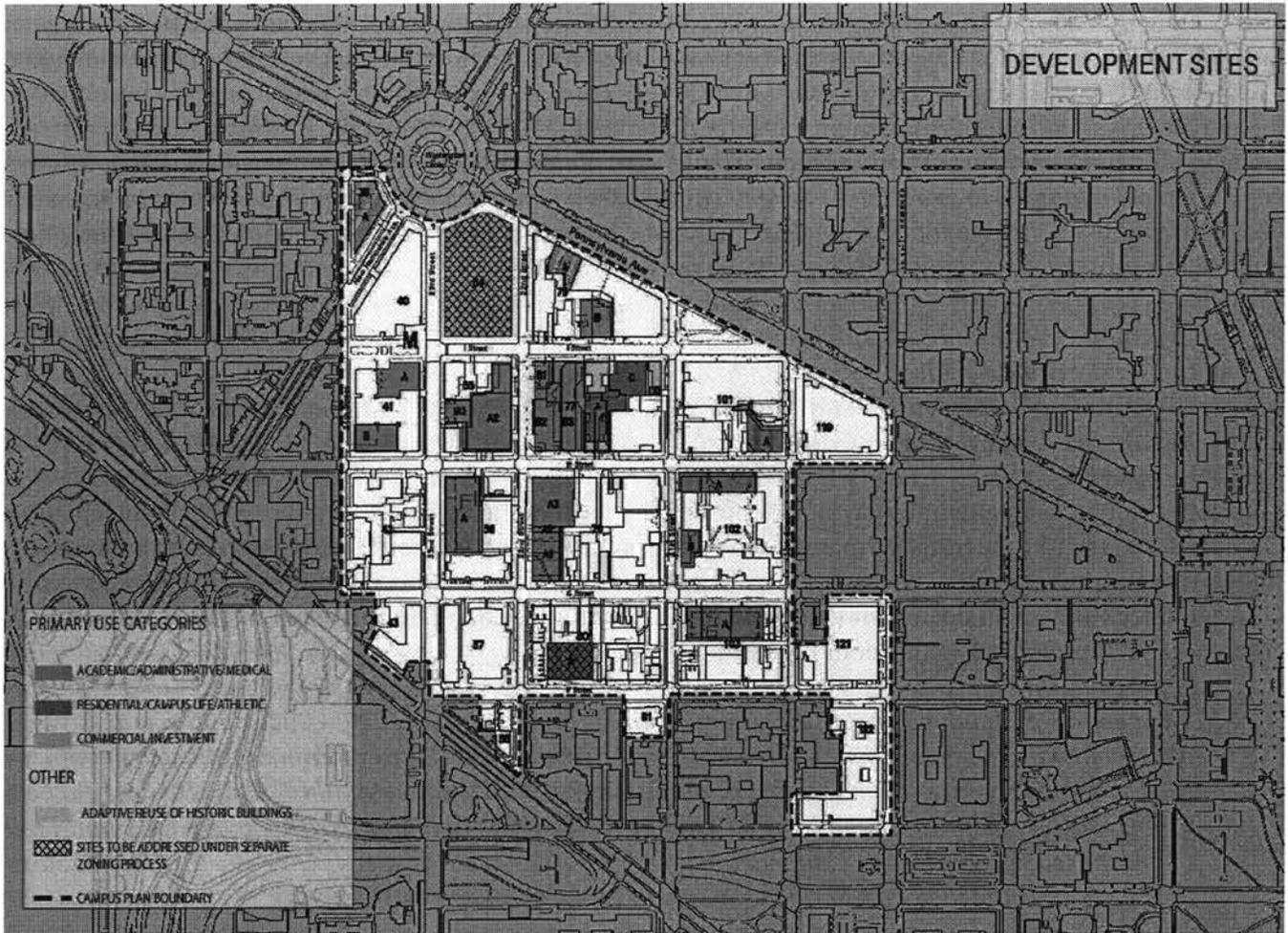


Figure 2: Development Sites

## GW COMMITMENTS AND CONDITIONS OF APPROVAL

In addition to bringing forward all of the relevant conditions from the 2000 campus plan, the university has added several significant commitments and clarified others in an attempt to meet the requests of the city and Foggy Bottom/West End community. OP has spent a significant amount of time negotiating commitments by the university and reviewing the final language presented here. The commitments are attached as a separate document to this report, but also discussed in detail here.

1. *The Applicant's proposed campus plan replaces the George Washington University Foggy Bottom Campus Plan: Years 2000 through 2009. This campus plan is approved until June 30, 2025, subject to the following conditions, or until such time prior to June 30, 2025 as the Zoning Commission determines that conditions warrant submission of a campus plan amendment or an updated campus plan.*

In light of the level of planning that has proceeded submission of the plan, the university has agreed to commit to a term exceeding the traditional ten years for a campus plan. This is an important commitment for all sides for many reasons. The development plan outlined above is not a short term endeavor. Many, if not most, of the buildings contemplated by the plan will not be completed in ten

years, some perhaps not in twenty. The increased development included in this plan was considered as the build-out potential for the campus and thus as a long-term maximum, rather than a limit to be met in a decade and then increased. The message that OP has consistently sent to the university has been that the university is reaching its maximum capacity, in terms of development and enrollment. This plan attempts to define that capacity and *the underlying assumption is that the university will maintain this capacity for the long-term and direct new growth to other locations such as satellite campuses*. A ten-year approval would hedge that message and leave the door open for a renegotiation in 2015. This is not in the interest of the community, the city, or the university.

- 2. The Applicant will not initiate litigation challenging Zoning Commission action which approves the Foggy Bottom Campus Plan: 2006 – 2025 as submitted by the University, including these Conditions 1-25, so long as such approval is not contingent on additional conditions to which the Applicant has not specifically agreed.*

This commitment is an attempt to avoid a repeat of the legal battle that followed the 2000 campus plan. OP has worked hard to identify as many issues as possible prior to submittal of the plan in order to have full GW commitment and cooperation. It is the intent of OP that all plan conditions will be agreed to by GW, included in the plan document that is eventually submitted to the Zoning Commission for final approval, and thus subject to this commitment.

- 3. The campus plan boundary for the Foggy Bottom Campus Plan: 2006 – 2025 shall remain consistent with the campus plan boundary established by the Board of Zoning Adjustment with respect to the Foggy Bottom Campus Plan: Years 2000 through 2009 (Order No. 16553-I). The properties included within the Foggy Bottom Campus Plan boundary are depicted in Exhibit I of the proposed Foggy Bottom Campus Plan: 2006 – 2025 and are specifically identified and listed in Appendix 1 attached hereto.*

GW has agreed with OP and the community to respect the existing plan boundaries and carry them forward in the new plan. No change or expansion would be considered for the life of the plan.

- 4. New development on campus resulting in additional density or change in use shall substantially conform with the approved campus plan, with the exception of minor renovation projects including those necessary to address building code compliance.*

This is the commitment discussed earlier in the development plan section that limits development projects to those specifically identified in the development plan. This commitment is intended to give assurance to the community that there will be no unexpected developments or surprises during the life of the plan.

- 5. The University shall notify the Office of Planning, ANC 2A, and the Advisory Committee (established pursuant to Condition 9) of its intent to develop a specific site on campus, following approval of the development proposal by appropriate University committees and the University's Board of Trustees, and prior to preparation of final detailed plans and specifications.*

Through this commitment, GW agrees to inform the city and community of its intent to file any second-stage PUD associated with the plan prior to the creation of building plans. This will allow ample preparation time for review of development projects.

6. *The University shall submit a second-stage Planned Unit Development application for each new development the University proposes over the term of the Foggy Bottom Campus Plan: 2006 – 2025. Each application shall include the following:*
  - a. *Demonstration of compliance with applicable provisions of the zoning regulations and the contents of the approved Foggy Bottom Campus Plan: 2006 – 2025;*
  - b. *A showing that the use, height, bulk, and design (including the location of any means of ingress and egress) of the proposed structure is sensitive to and compatible with adjacent and nearby non-University-owned structures and uses;*
  - c. *An indication of any need for, amount of, and proposed locations of interim leased space necessary to accommodate housing and/or activities displaced by construction and/or activities intended to be located permanently in the completed structure;*
  - d. *A report recalculating the University's total FAR within the campus plan boundaries, which shall also be submitted directly to the Office of Zoning and the Zoning Administrator. Information included in the report shall be broken down by zoning district and include the following: existing FAR, FAR under development pursuant to Commission approval, and FAR upon completion of proposed structure;*
  - e. *The most recent Foggy Bottom Campus Plan Compliance Report (as set forth in Condition 24) evidencing compliance with the approved Foggy Bottom Campus Plan: 2006 – 2025, including the most recent reported counts of Foggy Bottom student headcount, Foggy Bottom student full-time equivalent, Foggy Bottom faculty and staff headcount, Foggy Bottom faculty and staff full-time equivalent, full-time Foggy Bottom undergraduate students, on-campus beds, and full-time Foggy Bottom undergraduate students residing in the Foggy Bottom/West End Area outside of the campus plan boundaries;*
  - f. *A progress report on the implementation of the streetscape plan required by Condition 21;*
  - g. *The number of off-street parking spaces within the campus plan boundaries as set forth in Condition 22(b) as of 30 days prior to the application date, including documentation and an explanation of the methods and assumptions used in counting the parking spaces;*
  - h. *A status report on the Transportation Management Program required by Condition 23; and*
  - i. *Demonstration that the project has been presented to the Advisory Committee for consideration.*

Commitment 6 lays out the filing requirements for each future development project. This assists the Zoning Administrator and Zoning Commission in ensuring compliance with the campus plan. It is also intended to maintain transparent implementation of the plan. Subcondition i specifically requires that each project has been to the Advisory Committee, meaning that the group with first hand knowledge of campus plan compliance issues will have reviewed the project and applicable compliance documents prior to the project being submitted to the Zoning Commission.

7. *No PUD application filed by the University for second-stage review under the Foggy Bottom Campus Plan: 2006 – 2025 may be granted unless the University is in substantial compliance with Conditions 1-25 set forth herein as demonstrated by the most recently filed Foggy Bottom Campus Plan Compliance Report submitted to the Zoning Administrator. Further, any violation of these Conditions shall be grounds for the denial of any building permit or certificate of*

*occupancy applied for by the University for any University building or use, and may result in the imposition of fines and penalties pursuant to the Civil Enforcement Act, D.C. Code §§ 6-2701 to 6-2723.*

Condition 7 was the final condition of the 2000 plan providing recourse for the Zoning Administrator and Zoning Commission should GW fall out of compliance with any condition of the plan. Should the university be found by the ZA or ZC to be out of compliance with any aspect of the plan, the Commission has the authority to deny or decline hearing any application, and the ZA has the authority to deny building permits and certificates of occupancy until they are deemed to have returned to compliance with the plan.

8. *The University will not purchase additional residentially-zoned properties outside of the Campus Plan boundaries in the Foggy Bottom/West End area (defined as the area bounded by the Potomac River and Rock Creek Park to the west, N Street to the north, 19<sup>th</sup> Street to the east, and Constitution Avenue to the south) 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 University population. The University shall not include any such investment property in its undergraduate student housing program or otherwise directly refer undergraduate students to any such property.*

This condition is a significant new commitment by the university. It basically prevents GW from purchasing any residential property in the area and using it for university use, including dormitories. As of the date of this report, GW will maintain the ability to invest in property without changing the use.

9. *The University will work with community representatives to form an Advisory Committee for the purpose of fostering consistent communication between the University and the Foggy Bottom and West End communities, discussing issues of mutual interest and proposing solutions to problems that exist or arise in implementing the approved Foggy Bottom Campus Plan.*
- a. *Key functions of the Advisory Committee include:*
- i. *reviewing the University's compliance reporting;*
  - ii. *working with the Office of the Zoning Administrator to monitor compliance with the conditions of the Foggy Bottom Campus Plan; and*
  - ii. *reviewing new University proposals to develop sites on the Foggy Bottom Campus.*
- b. *Composition, Administrative Procedures & Meeting Format*
- i. *The Advisory Committee shall consist of ten members: five representatives of the University to be selected by GW and five representatives of the community to be selected by ANC 2A. The ANC shall select no more than three ANC commissioners and shall select at least one member to represent Foggy Bottom and at least one member to represent the West End.*
  - ii. *The quorum for Advisory Committee meetings will be five members.*
  - iii. *The first Advisory Committee meeting shall take place within two months of the adoption of the Campus Plan and include adoption of specific administrative procedures (subject to the terms of this Condition) that govern the operation of the body.*

- iv. *The Advisory Committee shall schedule quarterly meetings open to the public, and shall keep minutes of each meeting.*
- v. *Upon request and at least on a semiannual basis, the University will report to the Advisory Committee data relevant to campus planning that includes, but is not limited to: report on student enrollment, planned development projects included in the University's capital program, historic preservation, implementation of the streetscape plan, public space permits, and reports on all conditions and commitments adopted as part of the Campus Plan.*

This commitment is important for the success of this plan. Community relations have often been strained and this commitment would reopen lines of communication. The Advisory Committee is intended to represent both the university and community and foster discussion and, ideally, resolution of issues prior to any Zoning Commission meetings. The Advisory Committee should review all projects prior to PUD submission and will have access to all compliance review information. While the Zoning Administrator will maintain sole responsibility and authority to enforce campus plan compliance, the Advisory Committee should work closely with the Office of the Zoning Administrator in monitoring compliance. This condition sets the quorum for any meeting at five members so that the absence of either side at the meeting will not prevent the university from fulfilling its commitment.

10. *For the duration of this Plan, Foggy Bottom student headcount shall not exceed 20,000 students, and Foggy Bottom student full-time equivalent shall not exceed 16,553.*
- a. *Definition. For the purposes of these Conditions, "Foggy Bottom student headcount" shall be defined as the number of GW students in the "Foggy Bottom/Mount Vernon Campus Total Student Body", minus: study abroad students, continuous enrollment students, students that reside at the Mount Vernon Campus, students that take all of their courses at the Mount Vernon Campus, and Foggy Bottom faculty and staff accounted for pursuant to Condition 11 herein who are also enrolled in one or more courses at the Foggy Bottom campus.*
  - b. *Calculation of full-time equivalent. For the purposes of these Conditions, "Foggy Bottom student full-time equivalent" shall be determined by assigning a fraction to part-time students included in the Foggy Bottom student headcount number based on the number of credits they are taking compared to a full-time course load and adding the number of full-time students. Currently, the full-time course load for undergraduates is 12 credits, and the full-time course load for graduate and professional students is 9 credits. Formulas for determining full-time equivalents may change over the term of the proposed Foggy Bottom Campus Plan depending on program requirements or the restructuring of the academic calendar.*
  - c. *An audit of the Foggy Bottom student headcount and Foggy Bottom student full-time equivalent reported pursuant to Condition 24 herein shall be conducted in a manner and by a firm previously approved by the Zoning Administrator and the Advisory Committee. The audit shall be completed by January 10 of the year following each report submitted pursuant to Condition 24 herein.*

*All Foggy Bottom student counts shall be reported biannually as specifically set forth in Conditions 24 and 25.*

Condition 10 carries forward the existing limits on student enrollment. It is not contemplated by the university or the city that these numbers will ever be increased on the Foggy Bottom Campus.

Subconditions A and B are clarifying language missing from the 2000 Campus Plan. The existing plan limited student enrollment to control the effects of the Foggy Bottom campus on the surrounding neighborhood. Based on this assumption, it is logical and important to count all students living on or traveling to Foggy Bottom Campus to take classes. Conversely, it would not make sense to count anyone not creating an effect on the Foggy Bottom campus toward a student enrollment number designed to limit negative effects.

This condition will create a biannual count measuring enrollment on Foggy Bottom Campus each semester. The definition provided here is intended to count every student having an individual effect on the neighborhood. It starts by including all students at both the Foggy Bottom and Mount Vernon Campuses. It then subtracts any students not affecting the Foggy Bottom Campus including, students studying abroad, students paying the university but not enrolled in any classes, students living at or attending ALL their classes at Mount Vernon Campus, and GW staff taking classes as a benefit of their position. Students taking classes at both Mount Vernon and Foggy Bottom but not living at either are counted in the enrollment number.

Subcondition C requires an independent audit of the enrollment numbers for the fall semester of each year. Fall semester numbers are always higher than the spring semester and therefore would be out of compliance first should enrollment be too high.

11. *For the duration of this Plan, the Foggy Bottom faculty and staff population shall not exceed a total of 12,529 on a headcount basis, and 10,550 on a full-time equivalent basis.*
  - a. *For the purposes of these Conditions, “Foggy Bottom faculty and staff headcount” shall include: regular full-time faculty and staff; regular part-time faculty and staff; wage account staff that are not Foggy Bottom students accounted for pursuant to Condition 10; temporary part-time faculty (excluding part-time clinical faculty who are not paid employees of the University); and visiting instructional and research faculty. For the purposes of these Conditions, Foggy Bottom faculty and staff shall not include faculty and staff whose primary office locations are not on the Foggy Bottom campus; employees of non-GW owned or controlled entities which are located on the Foggy Bottom campus; and contractors that provide ancillary campus-related service functions who are not employees of the University.*
  - b. *For the purposes of these Conditions “Foggy Bottom faculty and staff full-time equivalent” shall be determined by assigning a fraction to part-time employees included in the Foggy Bottom faculty and staff headcount number based generally on the number of hours worked as compared to the standard full-time 40 hour work week.*

This condition brings forward the faculty and staff counts from the 2000 Campus Plan. Due to difficulty distinguishing between the two counts, faculty and other staff have been combined into one number for this plan the total of which is the same as the existing plan. The condition defines the faculty and staff population in a way that attempts to count all employees of the University affecting the campus area similar to the student enrollment count.

12. *For the duration of the Plan, the University shall make available on-campus beds for full-time Foggy Bottom undergraduate students equivalent to 70% of the full-time Foggy Bottom undergraduate student population up to an enrollment of 8,000, plus one bed per full-time Foggy Bottom undergraduate student over 8,000. For the purposes of these Conditions, the term “on-*

*campus beds” shall include beds available to full-time Foggy Bottom undergraduate students in any property in which the University has an ownership, leasehold, or contractual interest, or beds otherwise occupied by full-time Foggy Bottom undergraduate students in fraternities, sororities, or other programs recognized by or affiliated with the University and located within the campus plan boundary. Each report shall be accompanied by supporting documentation and full explanations of methods, assumptions, and sources used to compile information in the report. The University’s efforts with respect to this Condition shall be monitored by the Advisory Committee.*

Condition 12 maintains the existing requirement to house the majority of undergraduate students on campus. The university will continue to provide beds for 70% of the first 8,000 undergraduates and one bed for each undergraduate over 8,000. The numbers for full-time undergraduate students is taken from the total student enrollment minus all non-undergraduates and part-time undergraduates. Any university affiliated bed within campus boundaries counts as a bed toward this requirement.

13. *The University shall require all full-time Foggy Bottom freshmen and sophomore students to reside in housing located within the campus plan boundary. The University may exempt from this requirement students who commute (i.e., students who have established permanent residency off-campus prior to enrollment at GW or students who live off-campus with a parent, guardian, or other family member), are married or have children, or have disabilities or religious beliefs inconsistent with residence hall life. The University’s efforts with respect to this Condition shall be monitored by the Advisory Committee.*

This condition is brought forward from the 2000 Campus Plan and requires all freshman and sophomores to be housed on-campus.

14. *With respect to the housing of undergraduate students in off-campus properties which the University owns or has an interest in, except as otherwise provided by this Condition:*
  - a. *Effective August 31, 2006, GW shall not house undergraduate students in The Hall on Virginia Avenue.*
  - b. *Effective August 31, 2007, GW shall not house undergraduate students in The Aston.*
  - 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.*
  - d. *Effective July 1, 2016, GW shall not house undergraduate students in City Hall. Notwithstanding the foregoing, the University may offer housing in these off-campus facilities to students who are exempted from living on-campus pursuant to Condition 13 (specifically undergraduate students who are married or have children, or have disabilities or religious beliefs inconsistent with residence hall life). The University’s efforts with respect to this Condition shall be monitored by the Advisory Committee.*

This is a significant new condition of the new plan. GW has agreed to phase students out of The Hall on Virginia Avenue, The Aston, and Columbia Plaza over the next two years. The community has

continuously raised concerns about the effects of young students on the Foggy Bottom/West End residential areas off campus. This commitment by the University is an important step to lessen the impacts of its students on the surrounding community. The university will maintain the right to use these buildings for faculty or graduate students.

15. *The University shall maintain a program to provide its students who are eligible to live off-campus with information about housing opportunities outside the Foggy Bottom/West End Area. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.*

Conditions 15-19 are updated versions of conditions of the 2000 Campus Plan. Each of these commitments will be individually reviewed and monitored by the Advisory Committee at its regular meetings.

16. *The University shall use disciplinary interventions for acts of misconduct by students living off-campus in the Foggy Bottom/West End Area, even if students are not in properties owned or controlled by the University. The University shall act on incident reports by residents, ANC 2A, community associations, building management, building association boards, University security officers, and police. The University shall maintain an outreach program with neighboring apartment buildings to educate management companies and tenant associations on the University's disciplinary program and its reporting requirements to facilitate effective use of its program. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.*
17. *The University shall maintain and publicize a hotline available 24 hours per day, seven days per week to receive calls about student conduct issues and safety and security concerns. The University shall maintain a log of all calls received and all actions taken, including all referrals made. The University shall maintain its Crimes Tips Hotline (presently 994-TIPS), where calls can be made anonymously to a recorded "tip" line. Calls needing a more immediate response shall be directed to the University police (presently 994-6110) 24 hours per day, seven days per week. The University police will aid off-campus complainants in obtaining assistance from the Metropolitan Police Department. Reports of improper off-campus student conduct will also be referred to the appropriate University departments for their attention. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.*
18. *The University will maintain a mandatory program for its students that will address "good neighbor" issues, educating students about appropriate conduct in the off-campus community. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.*
19. *The University shall gather information about the local addresses of the full-time Foggy Bottom undergraduate population. The University shall compile and report the number of full-time Foggy Bottom undergraduate students residing in (1) Foggy Bottom/West End outside the campus boundaries; (2) the District of Columbia outside both the campus boundaries and the Foggy Bottom/West End Area, organized by postal codes; (3) Maryland; and (4) Virginia. This information shall be reported as set forth in Condition 24 herein.*

20. *Prior to public hearings on the Foggy Bottom Campus Plan: 2006 – 2025, the University, in conjunction with the Office of Planning, will initiate a mutually-agreed upon process that provides for the historic designation of the properties identified in this Campus Plan as architecturally or historically significant and that also accommodates the development sites identified in the Plan.*

This is the new commitment specifically discussed in the previous section. The result of this commitment is intended the new historic district described above.

21. *The University shall prepare a detailed streetscape plan applicable to the entire Foggy Bottom campus. The plan shall include, among other elements, a discussion of the installation of sign pylons and street signage, landscaping, lighting and street furniture. The streetscape plan shall be developed with input from with the Office of Planning and the Department of Transportation. A proposed draft streetscape plan will be submitted to the Zoning Commission prior to public hearings on the Foggy Bottom Campus Plan: 2006 – 2025.*

GW has submitted a draft of its new streetscape plan for review. GW has worked with DDOT and OP on the creation of this plan. The plan lays out streetscape improvements for all public streets on the GW campus over the life of the plan. OP expects to have a written DDOT report on the latest draft prior to the public hearings.

22. *The University shall implement the following measures to minimize adverse impacts associated with parking and traffic:*
- a. *Support of Mass Transit: The University shall maintain the Metrocheck program offered by the Washington Metropolitan Area Transportation Authority (WMATA) to allow employees to pay for public transportation costs on a pre-tax basis. The University shall maintain an introduction to public transportation program for incoming students that includes provision of WMATA's "SmarTrip" cards to incoming students. The University will work with WMATA to schedule SmarTrip "carding events" at various locations around campus to provide additional information about public transportation to the University community. In the event these programs are discontinued over the term of the campus plan, the University will work to identify alternative programs to support the goal of encouraging mass transit ridership.*
  - b. *Parking: The University shall continue to provide at least 2,800 off-street parking spaces, including proposed spaces to be dedicated for university use on Square 54 and all University-owned parking spaces on Square 122 (specifically including the parking lot and garage spaces at Old Main located at 1922 F Street, NW). The number of off-street parking spaces required to be provided may be increased in any subsequent further processing order pursuant to this plan if necessary to mitigate the adverse impact of the approved uses on the University's parking resources. The University shall monitor its utilization of University parking facilities to determine usage patterns and conduct an ongoing assessment of parking needs.*
  - c. *Notice: The University shall notify all affected property owners or occupants in a timely manner of the occurrence of any temporary street closing necessary to accommodate University-related functions.*
  - d. *Student Vehicles: The University, through its Office of Parking Services, shall maintain an accurate record of the license plate numbers of motor vehicles kept by students in*

*University parking facilities, to be updated annually at the beginning of each Fall semester. The University shall direct students to register their vehicles in the District of Columbia, or obtain a reciprocity sticker.*

Condition 22 is updated language from the 2000 Campus Plan. The university should continue to support mass transit and work to limit traffic and parking impacts. OP and GW have discussed the possibility of including a maximum number of university parking spaces in addition to the minimum count in order to limit the total number of trips possible to campus, but there is not enough information at this time to determine the proper number or the effects of such a limit.

23. *The University shall maintain, and periodically update, its comprehensive transportation management plan addressing traffic and parking associated with events on campus that are attended by a significant number of persons not normally associated with the University and the campus. The transportation management plan shall include the following:*
- a. *Measures to schedule events at times that reduce conflicts with other traffic and other demands for parking.*
  - b. *Measures to discourage travel by private automobile and encourage travel by public transportation.*
  - c. *Measures to encourage persons who drive to park in commercial or University Parking garages.*
  - d. *Any other specific measures to address parking demand and decrease vehicular traffic in the surrounding Foggy Bottom/West End Area.*

*The transportation management plan shall be submitted to and reviewed by the Advisory Committee on an annual basis as set forth in Condition 22.*

This condition is also carried forward from the 2000 Campus Plan.

24. *On November 20 of each year beginning in 2006, the University will file a Foggy Bottom Campus Plan Compliance Report with the Zoning Commission, Zoning Administrator, Office of Planning, ANC 2A, and the Advisory Committee. The Foggy Bottom Campus Plan Compliance Report shall contain the following information, reported as of the University Census Date unless otherwise noted:*
- a. *Current fall and previous spring semester Foggy Bottom student headcount and Foggy Bottom student full-time equivalent in accordance with Condition 10.*
  - b. *Current fall and previous spring semester Foggy Bottom faculty & staff headcount and Foggy Bottom faculty & staff full-time equivalent in accordance with Condition 11.*
  - c. *Data in connection with the on-campus undergraduate student housing requirement set forth in Condition 12, specifically:*
    - i. *Current fall and previous spring full-time Foggy Bottom undergraduate students. For purposes of these Conditions, “full-time Foggy Bottom undergraduate students” shall be defined as the number of students in the “Foggy Bottom/Mount Vernon Campus Total Student Body” minus graduate students, first professionals (JDs and MDs), undergraduates taking fewer than 12 credit hours at the Foggy Bottom campus, non-degree students, full-time undergraduate study abroad students, undergraduate continuous enrollment students, and full-time undergraduate students that reside at the Mount Vernon Campus.*

- ii. *The number of on-campus beds available to full-time Foggy Bottom undergraduate students;*
- iii. *The number of on-campus beds occupied by full-time Foggy Bottom undergraduate students;*
- iv. *The number of off-campus University-supplied beds within the Foggy Bottom/West End Area, defined as the area bounded by the Potomac River and Rock Creek Park to the west, N Street to the north, 19<sup>th</sup> Street to the east, and Constitution Avenue to the south;*
- v. *The number of off-campus University-supplied beds within the Foggy Bottom/West End Area occupied by full-time Foggy Bottom undergraduate students;*
- vi. *The number of off-campus University-supplied beds outside the Foggy Bottom/West End Area;*
- vii. *The number of off-campus University-supplied beds outside the Foggy Bottom/West End Area occupied by full-time Foggy Bottom undergraduate students.*

*All data shall be reported for each individual semester and also as an average of the reported fall and spring semesters. Compliance with the on-campus undergraduate student housing requirement set forth in Condition 12 shall be based upon the average of the reported fall and spring semesters until the fall 2010 semester or until the completion and occupancy of the next GW residence hall project proposed in accordance with the Foggy Bottom or Mount Vernon Campus Plans, whichever event first occurs. After the occurrence of the aforementioned event and for the remainder of the term of this Plan, compliance with the on-campus undergraduate student housing requirement set forth in Condition 12 shall be based upon the data reported for each individual semester.*

- d. *Information evidencing compliance with Condition 15.*
- e. *Information evidencing compliance with Condition 16.*
- f. *Information evidencing compliance with Condition 17.*
- g. *Information evidencing compliance with Condition 18.*
- h. *Updated address information in accordance with Condition 19.*
- i. *Current inventory of University-owned parking spaces and other evidence of compliance with Condition 22(b).*
- j. *Information evidencing compliance with Condition 23.*

*Each report shall be accompanied by supporting documentation and full explanations of methods, assumptions, and sources used to compile information in the report.*

Condition 24 requires a comprehensive compliance document at the middle of each fall semester. This document is intended to go to all involved parties and should document compliance with all applicable campus plan conditions. It is intended that this document will be reviewed by the Advisory Committee at the end of each year and used by the Zoning Administrator for compliance review. In addition, the latest version of this document will be included with each second stage PUD submittal.

- 25. *On April 15 of each year beginning in 2007, the University will file an Interim Foggy Bottom Campus Plan Compliance Report with the Zoning Administrator and the Advisory Committee. The Interim Foggy Bottom Campus Plan Compliance Report shall*

*contain the following information, reported as of the University Census date unless otherwise noted:*

- a. Current spring and previous fall semester Foggy Bottom student headcount and Foggy Bottom student full-time equivalent in accordance with Condition 10.*
- b. A copy of the audit report of the previous fall semester Foggy Bottom student headcount and Foggy Bottom student full-time equivalent conducted pursuant to condition 10(c) herein.*
- c. Current spring and previous fall semester Foggy Bottom faculty and staff headcount and Foggy Bottom faculty and staff full-time equivalent in accordance with Condition 11.*
- d. Data in connection with the on-campus undergraduate student housing requirement set forth in Condition 12, specifically:*
  - i. Current spring and previous fall full-time Foggy Bottom undergraduate students. For purposes of these Conditions, “full-time Foggy Bottom undergraduate students” shall be defined as the number of students in the Foggy Bottom/Mount Vernon campus total student body minus all graduate students, all first professionals (JDs and MDs), all undergraduates taking fewer than 12 credit hours at the Foggy Bottom campus, non-degree students, full-time undergraduate study abroad students, undergraduate continuous enrollment students, and full-time undergraduate students that reside at the Mount Vernon Campus..*
  - ii. The number of on-campus beds available to full-time Foggy Bottom undergraduate students;*
  - iii. The number of on-campus beds occupied by full-time Foggy Bottom undergraduate students;*
  - iv. The number of off-campus University-supplied beds within the Foggy Bottom/West End Area, defined as the area bounded by the Potomac River and Rock Creek Park to the west, N Street to the north, 19<sup>th</sup> Street to the east, and Constitution Avenue to the south;*
  - v. The number of off-campus University-supplied beds within the Foggy Bottom/West End Area occupied by full-time Foggy Bottom undergraduate students;*
  - vi. The number of off-campus University-supplied beds outside the Foggy Bottom/West End Area;*
  - vii. The number of off-campus University-supplied beds outside the Foggy Bottom/West End Area occupied by full-time Foggy Bottom undergraduate students.*

*All data shall be reported for each individual semester and also as an average of the spring and fall reported semesters. Compliance with the on-campus undergraduate student housing requirement set forth in Condition 12 shall be based upon the average of the reported spring and fall semesters until the fall 2010 semester or until the completion and occupancy of the next GW residence hall project proposed in accordance with the Foggy Bottom or Mount Vernon Campus Plans, whichever event first occurs.<sup>4</sup> After the occurrence of the aforementioned event and for the remainder of the term of this Plan, compliance with the on-campus undergraduate student housing requirement set forth in Condition 12 shall be based upon the data reported for each individual semester.*

*Each report shall be accompanied by supporting documentation and full explanations of methods, assumptions, and sources used to compile information in the report.*

This final condition requires the university to provide a spring semester compliance document. This document reports the enrollment, employee, and bed numbers for the spring semester, but does not require updates of other conditions that are not likely to change mid-year. This report also adds the independent audit that is required by condition 10. This audit will independently confirm the enrollment numbers from the previous fall semester.

### **PUD PROCESS**

One of the most significant aspects of this plan is that, because of the comprehensive level of planning that has occurred, GW has committed to the city and the neighborhood that no development will take place outside of the proposed sites. The 2000 Campus Plan allows further processing applications, which means that developments in general consistency with the plan could be submitted by the University even if not previously identified. The proposal with this plan would be for the university to limit all new development on campus to the sites identified on the development plan at the agreed to heights and densities. The university is, in effect, backing up its plan and the process that created it with an additional commitment to a Planned Unit Development procedure. This can be accomplished through a comprehensive two-stage PUD for the campus. The first stage would include the entire campus, identifying the development sites, massing, and use. Each future development project would be brought forward as a second stage PUD and reviewed individually in light of the overall campus plan. This is not unlike the process approved by the Commission for the Washington Hospital Center.

The Planned Unit Development procedure is the only process that will adequately provide certainty to all sides about how the plan will be fulfilled. First, it assures the Zoning Commission and the community that the development plan approved, including sites not identified for development, will be adhered to by the University for the life of the plan. Any proposed development not identified would not be able to move forward as further processing, but would be a modification to the campus-wide first-stage PUD that, since linked to the plan, would require a complete change of the campus plan. Second, the PUD process grants the university the assurance of conceptual density, height, and use approval that allow them to commit to such a comprehensive and detailed plan for an extended period of time. Any zone changes would be subject to the campus plan approved first-stage PUD and not open to any other uses or buildings. Moreover, the PUD process provides the additional benefits of design review and amenity discussion at the time of submission of each project as a second-stage PUD. It is anticipated that while the general massing of projects is approved by the first stage, the university will still have a burden of proof at each second stage to address the normal PUD standards including design, impacts, and compliance with campus plan commitments. As one of the major concepts of this plan is compatibility with the existing campus character as well as the historic and residential properties in and around campus, it is important to have a strong design review process guided by the plan and enforced through the PUD process. The PUD process provides the opportunity for the university to make and keep commitments that are vital to rebuilding trust with the surrounding community.

In addition to providing the city with control over development in the proposed plan, the campus plan related PUD process is intended to ensure that the development potential exists for the university to accommodate the space needs for its current student enrollment on the existing campus. To this end, OP recommends that the university be required to complete a substantial majority of its development plan prior to the expiration of the campus plan before the first stage PUD would become permanently vested. The exact percentage and measurement tool will be determined by the Zoning Commission, however no vesting of the first stage PUD would relieve the university of the requirement of future campus plan reviews.

### DENSITY CHANGES

As stated above, the development plan attempts to limit GW to the maximum development appropriate for the campus and surrounding area. The plan has limited density in some areas and concentrated it in others resulting in a plan that should both protect and enhance the existing campus and larger area. The resulting development plan will meet the needs of the Foggy Bottom Campus for the foreseeable future and allow the university to make additional commitments such as removing undergraduates from university-owned off-campus housing. The aggregate FAR resulting from this plan will be less than 4.0 on the residentially zoned portions of campus and less than 5.0 for the entire campus, including commercially zoned properties which are not subject to the requirements of Section 210.

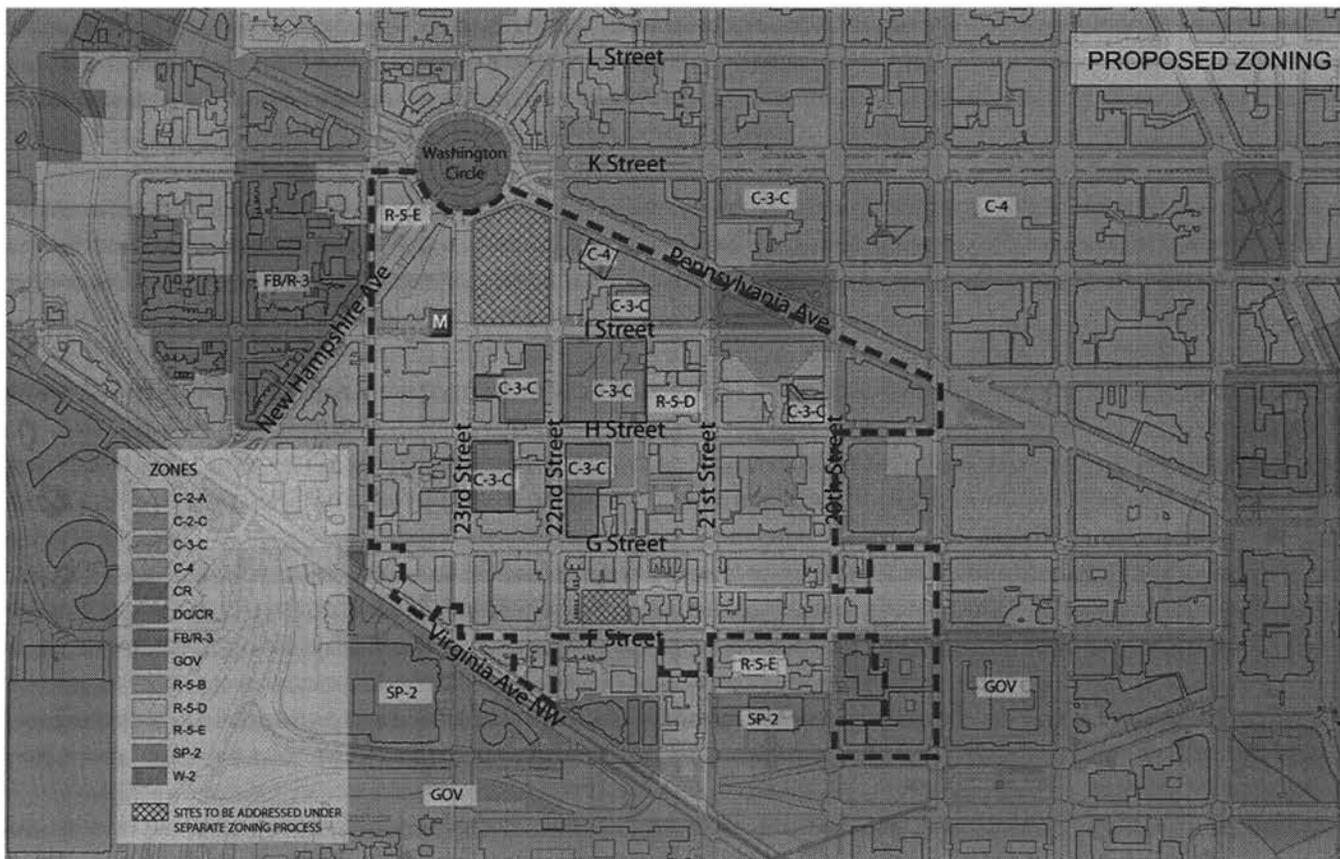


Figure 3: Proposed Zoning

#### PUD-Related Map Amendment

The concentration of height and density in the center of campus leaves unused density around the periphery of campus near neighboring residential areas below what would be allowed in the R-5-D zone, however moving the resulting mass in the core is not consistent with the underlying zoning. For this reason, the plan suggests a PUD-related zoning change for nine of the development sites. Seven in the central core and one at 20<sup>th</sup> and H Street would be rezoned to C-3-C. One property along Pennsylvania Avenue would be rezoned to C-4. The change would allow height and bulk that would not otherwise be allowed in the R-5-D zone. The result of these map amendments will be an extension of the existing C-3-C zoning along Pennsylvania Avenue into the core of campus. It will not affect non-university owned properties and will allow the retention of a lower density buffer area between central campus and the surrounding neighborhoods. The proposed changes are shown in Figure 3.

## **COMPREHENSIVE PLAN**

The Comprehensive Plan Generalized Land Use Map identifies the campus area as institutional use. This use category is designed for college, university, and other institutional uses. The uses and buildings described by this plan are completely compatible and consistent with the institutional use category. The Pennsylvania Avenue frontage is identified as high density commercial allowing for the highest density commercial uses along this corridor and specifically, the north side of Square 54.

The Land Use element of the Comprehensive Plan does not specifically address George Washington University growth, however, this plan does support policies protecting established residential neighborhoods as well as policies supporting economic development. The submitted plan is an effort to accomplish both of those goals. Section 1340 of the Ward 2 Plan states that “The development plan of [George Washington University] should not adversely impact surrounding, adjacent residential areas, but rather should improve such neighborhoods by improved landscaping, better lighting, and enhanced community policing.” The proposed plan attempts to meet all of these requirements through a community sensitive development plan, a comprehensive streetscape plan, and commitments that address student behavior and community policing. The Ward 2 Plan also specifically discusses the protection of historic resources and this plan furthers this goal through the formation of a potential historic district.

## **AGENCY COMMENTS**

GW has continued to work on the streetscape plan as a part of this application. OP and DDOT have worked with the university on producing a comprehensive streetscape plan that will fully define public space improvements to be made to the university area over the course of the campus plan. The latest draft of the streetscape plan was submitted to OP and the Commission on August 25, 2006 along with an updated traffic impact study. Both of these documents are currently under review by DDOT. OP expects to have a written report from DDOT on the streetscape plan and traffic study prior to the public hearing. If the campus plan is approved, GW will be expected to continue working with DDOT and OP to finalize the streetscape plan and implement any changes the Zoning Commission might recommend.

No comments or changes were received from other district agencies regarding the plan.

## **ENROLLMENT AUDIT**

In the April setdown report, OP requested the Zoning Administrator to conduct an audit of the GW student enrollment headcount in an attempt to resolve the issue of GW compliance with this aspect of the existing campus plan. The resulting memo from the Zoning Administrator lays out the history of the audit, the audit process, and the results found by the ZA. In his results, Mr. Crews determines that the University is in compliance with the condition on student enrollment at the Foggy Bottom Campus based on the existing and previously unchallenged methodology. He goes on to offer two suggested changes for counting enrollment in the future. He suggests that the Zoning Commission add Mount Vernon students taking courses at Foggy Bottom to the Foggy Bottom student headcount. He also recommends that faculty also taking classes while on campus be removed from the total student headcount. These are important issues and have been reflected in the way student enrollment would be counted in the new plan.

## COMMUNITY ISSUES

Both the ANC and local community organizations have continued to express concerns with this application. On Wednesday, August 16, 2006, ANC 2A adopted a letter to the Zoning Commission identifying seven areas of concern with the plan and the process. These are reviewed here:

1. The ANC requests proof that the university is in compliance with the conditions of the existing campus plan and the opportunity to rebut any proof offered. Per the requirements of the existing campus plan, GW has regularly filed compliance documents for each further processing case with the District and the ANC. The university has not yet been found to be out of compliance with the existing conditions at any stage. At the outset of this process, the ANC questioned the university's compliance with its student enrollment headcount. At the request of OP, the Zoning Administrator has conducted an audit of student enrollment, as described above, and found the university to be in compliance with this condition. The authority for determining compliance continues to lie with the Zoning Commission and the Zoning Administrator. To date, neither has found any reason to find that the university has ever been out of compliance with any condition of its campus plan.
2. The ANC chooses to oppose any PUD or map amendment in favor of the existing guidelines set out in section 210 of the zoning regulations. This position, however, does not reflect a complete picture of the zoning mechanisms available to the university. Section 210 is written to allow universities to allocate their matter-of-right density around the campus in a way that private entities cannot without zoning relief. It does not preclude the university from pursuing greater than matter-of-right options through variance, PUD, or rezoning. Under the existing plan, the university can continue to submit piecemeal development projects using either the further processing for matter-of-right densities, or the PUD for projects with bonus density. One of the major intents of OP in the new campus plan was to push the university to think about its overall development scheme in a comprehensive manner. Rather than having twenty different, unrelated further processing cases over the next twenty years, many of which would necessarily request extra density and would not be planned out thoughtfully, the university has made a comprehensive plan to define its needs and design a campus that confines its density and respects its surroundings. While the density increase seems significant compared to section 210, it has the multiple advantages of significant new commitments, removing development potential where it is not desired, and offering a level of certainty and planning in what the city and the neighborhood can expect to see over the next twenty years.
3. The ANC finds that the use of University property has become objectionable to the surrounding neighborhoods and development should be capped at its existing limit. One of the main purposes of the new campus plan is to try to *reduce* the objectionable university impacts on the surrounding neighborhood. In general, the impacts of the university do not result from the buildings themselves, but from students, staff, traffic, parking, and other results of people moving to, from, and through the campus. The proposed new campus plan would allow the university to build larger classes and more modern facilities, but would not allow any increase in students or staff from the existing caps. In addition, the new commitments as a result of the increased density will bring a large number of students out of the surrounding neighborhood and into facilities on campus. Rather than just equating FAR with objectionable impacts, the new plan attempts to define those aspects of the campus environment that actually create negative impacts and take steps to improve the situation.

4. The ANC encourages the consideration of satellite campuses as an alternative to university growth in Foggy Bottom. OP agrees with this statement and has encouraged the university to consider other locations in the District for future satellite campuses. It is the intention of OP that the existing student enrollment cap will be maintained in the long term and that any additional student enrollment must be accommodated outside of the Foggy Bottom area.
5. The ANC states that Square 54 could accommodate much of the university's needed growth and eliminate much of the need for development elsewhere on campus. While true on its face, this statement fails to take into account that commercial development of Square 54 can be of greater value to the university, the city, and even the neighborhood. From the university's perspective, commercial development of this site creates a revenue stream that allows the modernization of campus without an increase in enrollment and prevents the university from relying solely on tuition for necessary improvements. To the city, Square 54 represents a world-class mixed use development on the site, which serves as an important landmark anchoring the Pennsylvania Avenue corridor. For the neighborhood, commercial development of Square 54 offers several benefits. In addition to providing a much needed grocery store and neighborhood serving retail, the development can provide significant community amenities including public space and an eventual second metro entrance closer to the center of campus. The residential component contribute to rebuilding the residential fabric which was eroded over the years due to the University's lack of adequate housing provision. In addition, it will provide an on-campus apartment alternative to students who would otherwise rent in the surrounding area, while the development allows the university to discontinue all of its off campus undergraduate housing.
6. The ANC has requested an Environmental Impact Statement for Square 54 and other developments on 23<sup>rd</sup> Street prior to consideration of the Square 54 PUD. OP continues to share the community's concern with environmentally safe development and will expect the Square 54 project and all campus developments to comply with environmental review guidelines. At this time, the regulations call for this process to be completed at the building permit stage and not at the time of a first-stage PUD where there are no building plans or designs.
7. The final ANC comment regards the text amendment to Section 210.3 to change the matter-of-right aggregate FAR for the campus plan. Upon consultation with the Office of the Attorney General, OP has concluded that this text amendment is not necessary to achieve the density contemplated in the campus plan and has withdrawn this application.

Additionally, at the ANC meeting of August 16, 2006, the ANC chair questioned the continuation of the commitment for an advisory committee stating that the neighborhood is not responsible for monitoring university compliance. OP has never envisioned taking any responsibility for monitoring compliance away from the Zoning Administrator. The intent of the advisory committee is both to have interested parties who are close to the issues available to provide information to the Zoning Administrator as well as to provide a forum for university and neighborhood representatives to discuss other day to day issues that do not rise to the level of campus plan compliance.

## **RECOMMENDATION**

**OP recommends that the proposed campus plan and related PUD be approved subject to the attached conditions.** OP finds that the proposed plan is not inconsistent with the D.C. Comprehensive

Plan and meets the zoning requirements for a campus plan. Furthermore, the related PUD will allow implementation of the campus plan development plan while limiting development on the remainder of campus. OP finds the commitments associated with this plan, including but not limited to the historic district, plan for streetscape improvements, removal of undergraduate dorms from the surrounding neighborhood, and increased reporting conditions, to be commensurate with the bonus density being sought through the PUD.

Figures 2 & 3 drawn by EE&K Architects

EM/tp